

**APPENDIX F**

**ESTIMATION OF EXPOSURE OF PERSONS TO METHYL BROMIDE DURING AND/OR  
AFTER AGRICULTURAL AND NON-AGRICULTURAL USES**

ESTIMATION OF EXPOSURE OF PERSONS TO METHYL BROMIDE  
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## EXECUTIVE SUMMARY

Methyl bromide has been used extensively to fumigate soil, agricultural commodities, and structures in California. In 1995, all uses of methyl bromide amounted to 17.2 million pounds of active ingredient. Based on this amount, uses of methyl bromide for soil fumigation, commodity post-harvest fumigation, and structural pest control were 95.6, 1.4, and 3.0 percent, respectively.

This exposure assessment document was prepared as part of the Department of Pesticide Regulation's risk assessment process for methyl bromide. Adverse effects of methyl bromide, which were used to establish the endpoints for the critical no-observed-effect levels for risk assessment, were developmental toxicity (acute), neurotoxicity (subchronic), and nasal hyperplasia and degeneration (chronic). This document contains information, including physical and chemical properties, regulatory history, formulations, usage, label precautions, human illnesses, dermal toxicity/sensitization, animal metabolism, inhalation uptake and dermal absorption, and exposure assessment. Methyl bromide exposure estimates for workers and residents/bystanders were calculated from air concentrations of methyl bromide, and frequency and duration of exposures. Exposure estimates are reported as the 24-hour Time-Weighted Average (TWA).

Due to its high vapor pressure, the major route of exposure is by inhalation. Major excretion routes in rats after inhalation exposure occurred in exhaled air and urine. From 1991 to 1995, methyl bromide alone and methyl bromide in combination with chloropicrin caused 68 and 83 illnesses in California, respectively. From 1982 to 1995, there were accidental exposures where 231 people were evacuated. From the same period (1982-1995), there were 18 deaths resulting entirely from structural fumigation and all but two were from illegal reentry of locked, posted structures.

Exposure assessments for methyl bromide were grouped into 10 exposure scenarios. The average of acute exposure estimates (part per billion) calculated as the 24-hour TWA for these exposure scenarios are: 1) Preplant soil injection fumigation, 0.6-835; 2) Soil fumigation in nurseries and greenhouses, 1-562; 3) Fumigation of grain products, 6-6,039; 4) Dried fruit and tree nut fumigation, 0.4-13,281; 5) Fumigation of cherries for export, 11-327 (compliance monitoring study at dump stations, 18); 6) Worker exposure and on-site air monitoring studies at a walnut processing facility, 2-4,100 (compliance monitoring study in work areas, 28-479); 7) Space-type fumigation at a brewery facility, 25-173; 8.a) Residents/bystanders (air concentrations near fumigated single-family houses), 24-522; 8.b) Residents/bystanders (downwind air concentrations during aeration of fumigated single-family houses), 40-296; 9) Resident exposure to methyl bromide during reentry into treated houses, 210 (default); 10) Exposure of residents to methyl bromide during commodity fumigation, 210 (default). Many of these studies were conducted prior to the implementation of permit conditions/regulations and may not reflect exposure after restrictions were implemented; these studies were soil fumigation, nursery potting soil fumigation, greenhouse soil fumigation, fumigation of grain products, fumigation of dried fruit and tree nut products, fumigation at a walnut processing and a brewery facility, and fumigation of houses. The Department of Pesticide Regulation does not have data to assess all worker exposure scenarios or potential exposure to the public from all methyl bromide applications.

Non-acute exposures (7-day, 90-day, and 365-day exposure periods) were also estimated for different work tasks and exposure scenarios. These exposures were estimated from acute exposure, and frequency and duration of exposure for each specific exposure scenario.

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Department of Pesticide Regulation  
Worker Health and Safety Branch

Human Exposure Assessment

METHYL BROMIDE

October 5, 1999

**INTRODUCTION**

Methyl bromide (MB) is widely used as a fumigant to control pests in soil, fresh and dry agricultural products, residences and other structures. This fumigant is acutely toxic to humans from excessive inhalation exposure. Steps were taken in California in the past several years to reduce potentially harmful exposures to users and residents/bystanders. These steps included issuing new and more restrictive permit conditions, establishing buffer zones, modifying application equipment, and increasing aeration time for fumigated structures. Currently, the Department of Pesticide Regulation (DPR) is working on the risk assessment of MB under the provision of the Birth Defects Prevention Act of 1986 (SB 950). The Worker Health and Safety Branch (WH&S) is responsible for the preparation of the MB exposure assessment document, which is an integral part of the risk assessment process.

Many exposure monitoring studies were conducted prior to the implementation of permit conditions/regulations and may not reflect exposure after restrictions were implemented; these studies were soil fumigation, nursery potting soil fumigation, greenhouse soil fumigation, fumigation of grain products, fumigation of dried fruit and tree nut products, fumigation at a walnut processing and a brewery facility, and fumigation of houses. The Department of Pesticide Regulation does not have data to assess all worker exposure scenarios or potential exposure to the public from all methyl bromide applications.

The exposure assessment document contains sections dealing with physical and chemical properties, regulatory history, formulations, usage, label precautions, human illnesses, dermal toxicity/sensitization, animal metabolism, inhalation uptake and dermal absorption. Information from these sections contributes better understanding of the nature, usage, and potential for exposure. Exposure estimates are presented as the 24-hour time-weighted-average (TWA) air concentration of MB. These estimates are grouped as acute exposure (daily exposure) and non-acute exposures (subacute, subchronic, and chronic exposures).

**PHYSICAL AND CHEMICAL PROPERTIES**

Physical and chemical properties of MB as mentioned below were obtained from the Farm Chemicals Handbook (Meister, 1995), the Merck Index (Budavari *et al.*, 1989), and United States Environmental Protection Agency (U.S. EPA, 1986a).

Chemical name: Bromomethane, monobromomethane

CAS Registry number: 74-83-9

Common name: Methyl bromide

Trade names: Brom, Brom-O-Gas, M-B-R, Metabrom, Meth-O-Gas, Methyl Bromide, Pic-Brom, Terr-O-Gas, Tri-Brom, Tri-Con, Tri-Pan.

Molecular formula: CH<sub>3</sub>Br

Molecular weight: 94.95 g/mole

Chemical structure: CH<sub>3</sub>-Br

Physical appearance: Colorless gas, usually odorless; sweetish, chloroform-like odor at high concentrations (odor threshold at 80 mg/m<sup>3</sup> or 20.6 ppm); burning taste. It is non-flammable in air but does burn in oxygen.

Solubility: 1.75 g/100 g water (20 °C, 748 mm Hg), forms a crystal hydrate, CH<sub>3</sub>Br·20H<sub>2</sub>O, below 4 °C; freely soluble in alcohol, chloroform, ether, carbon disulfide, carbon tetrachloride, benzene.

Boiling point: 3.56 °C

Melting point: -93.66 °C

Octanol/Water partition coefficient: Log P = 1.19 (15.5:1)

Vapor pressure: 1420 mm Hg (20 °C), 2600 mm Hg (40 °C)

Specific gravity: 1.7 g/mL (liquid)

Vapor density: 3.3 g/L (gas)

Conversion factor: 1 ppm = 3.89 mg/m<sup>3</sup> at 25 °C

## REGULATORY HISTORY INCLUDING U.S. EPA STATUS

The insecticidal activity of MB was first reported in 1932 (Le Goupil, 1932). MB is a restricted use pesticide in the United States. Retail sale and use are limited to certified applicators or persons under their direct supervision, and only for those uses covered by the applicator's certification.

### Ozone depletion

1. MB is an ozone depleter with a calculated ozone depletion potential (ODP) of 0.7 (Watson *et al.*, 1992).
2. The world-wide sources of MB include: Anthropogenic (human made) agriculture, biomass burning (forest fires, grass fires), leaded gasoline burning, and oceans.
3. U.S. Clean Air Act mandated that by the year of 2005, no production or importation of MB is allowed. However, the Act does not restrict the use which is regulated under the Federal Insecticide, Fungicide and Rodenticide Act in the U.S. EPA, Office of Pesticide Programs.
4. At the 1997 meeting, Parties (over 125 nations) to the Montreal Protocol amended the previous deadlines. The new deadlines on complete phase-out of use are 2015 and 2005 for developing and industrial nations, respectively.

### Federal Regulations

1. The U.S. EPA established tolerances in commodities based on inorganic bromide level because of the assumption that MB is degraded completely to bromide (Federal Register, 1991).



2. The oral reference dose (RfD) was determined to be 0.0014 mg/kg/day based on the no-observed-effect level (NOEL) of 1.4 mg/kg/day for forestomach epithelial hyperplasia in a rat oral subchronic study (Danse *et al.*, 1984) and an uncertainty factor of 1,000. The inhalation reference concentration (RfC) was  $5 \times 10^{-3}$  mg/m<sup>3</sup> (1.3 ppb) based on the lowest-observed-adverse-effect level (LOAEL) of 3 ppm for nasal olfactory epithelial hyperplasia from a rat chronic inhalation study (Reuzel *et al.*, 1987 and 1991) and an uncertainty factor of 100.
3. The drinking water health advisories for MB for one-day, ten-day, and longer-term health advisory for a child is 0.1 mg/L assuming 1 L/day water consumption for a 10-kg child (U.S. EPA, 1992). The longer-term health advisory for an adult is 0.5 mg/L assuming 2 L/day water consumption for a 70-kg adult. The lifetime health advisory is 0.01 mg/L assuming 20% of exposure by drinking water.
4. MB is classified as a "Group D" carcinogen (not classifiable as to human carcinogenicity) by U.S. EPA due to inadequate human and animal data (U.S. EPA, 1992).

### **California Regulations**

1. For occupational exposure to MB, the current permissible exposure limit (PEL) for MB is 5 ppm or 20 mg/m<sup>3</sup> and a ceiling limit of 50 ppm.
2. In 1992, monitoring data caused the DPR to be concerned regarding the risk from short-term exposures to MB both to structural workers and residents returning to recently fumigated structures. The DPR promulgated emergency regulations to decrease the exposure and required pest control operators to hand out a Fact Sheet explaining the potential human hazards of MB fumigation. Permit conditions were developed for soil, and commodity fumigation.
3. On January 1, 1993, MB, as structural fumigant, was administratively listed by the Office of Environmental Health Hazard Assessment (OEHHA) as a developmental toxicant under Proposition 65 via the provision for listing due to the federal label warning requirement.
4. The Proposition 65 Developmental and Reproductive Toxicity Identification (DART) Committee of the OEHHA Science Advisory Board decided that evidence from experimental animals had not "clearly shown" that MB caused developmental and reproductive toxicity. MB remains listed under Proposition 65 for structural fumigation uses only.

## **FORMULATIONS**

In 1998, more than 50 MB-containing products were registered in California. Table 1 shows % active ingredient (a.i.) and trade (product) names of 52 products. Some products contain chloropicrin as a warning agent. Chloropicrin is also a fumigant similar to MB in controlling pests. Detailed information on application rate and sites is available from the DPR home page. There is too much information to summarize or provide as hard copy in this document.

Table 1 presents a DPR database search of MB active products as of June 9, 1998.

Table 1. MB products registered in California in 1998.

Product Name	Formulation	Company	% MB	% Chloropicrin listed as a.i.
50-50	P	A	50	50
57-43	P	A	58	43
67-33	P	G	67	33
67-33 Preplant Soil Fumigant	P	A	67	33
75-25	P	A	75	25
80-20	PG	A	79	19
98-2	P	G	98	0
98-2 Contains 2% Chloropicrin	P	A	97.6	0
Brom-76	PG	S	75	1
Bromo-O-Gas (Liquid)	PG	G	98	0
Bromo-O-Gas 0.5%	PG	G	99.5	0
Bromo-O-Gas 0.25%	P	G	99.75	0
Bromo-O-Gas 2%	P	G	98	0
M-B-R 98	P	AL	98	0
M-B-R 98 Technical	P	AL	98	0
Metabrom 100	P	A	99.7	0
Metabrom 99	P	A	99.65	0.25
Metabrom Q	PG	A	100	0
Meth-O-Gas	PG	G	100	0
Meth-O-Gas 100	PG	G	100	0
Meth-O-Gas Q	P	G	100	0
Methyl Bromide	P	G	100	0
Methyl Bromide 100	PG	S	100	0
Methyl Bromide 100	PG	A	100	0
Methyl Bromide 89.5%	PG	T	89.5	0
Methyl Bromide 98%	P	S	98	0
Methyl Bromide 98%	PG	T	98	0
Methyl Bromide 99.5%	PG	S	99.5	0
Methyl Bromide 99.5%	PG	T	99.5	0.5
Methyl Bromide 99.75%	PG	S	99.75	0
Methyl Bromide Quarantine Fumigant	PG	S	100	0
Pic-Brom 25	PG	S	75	25
Pic-Brom 33	PG	S	67	33
Pic-Brom 43	PG	S	57	43
Pic-Brom 50	PG	S	50	50
Pic-Brom 55	PG	S	45	55
Pic-Brom 67	PG	S	33	67
Terr-O-Gas 57	PG	G	57	41.5
Terr-O-Gas 67	PG	G	67	33
Terr-O-Gas 75	PG	G	75	25
Terr-O-Gas 80	PG	G	80	20
Terr-O-Gas 98	P	G	98	2

Table 1 (cont.). MB products registered in California in 1998.

Product Name	Formulation	Company	% MB	% Chloropicrin listed as a.i.
Tri-Brom	P	T	99	0
Tri-Con 45/55	P	T	45	55
Tri-Con 50/50	PG	T	50	50
Tri-Con 57/43	PG	T	57	42.6
Tri-Con 67/33	PG	T	67	32.7
Tri-Con 75/25	PG	T	75	24.8
Tri-Con 80/20	P	T	80	19.8
Tri-Con 80/20	P	SM	80	19.8
Tri-Pan 76/24	PG	T	75	24.0
TriCal Methyl Bromide 99.5%	P	SM	99.5	0

P = pressurized liquid/sprays/foggers; PG = pressurized gas; A = Ameribrom, G = Great Lakes, S = Soil Chemical Corp; AL = Albermarle; T = TriCal; SM = Shadow Mountain (part of TriCal)

### USAGE

The use information from 1992 to 1995 provided by the Information Systems Branch, DPR, follows (Tables 2-5).

Table 2. Summary of usage in 1992 from the DPR database.

	Usage	Lbs MB	% Total
A.	Soil (total)	16,258,179	95.68
	<i>Top five uses for soil:</i>		
	Strawberry (All or Unspecified)	4,963,112	29.21
	Almond	1,398,146	8.23
	Preplant-Outdoor (Seedbeds, etc.)	1,320,454	7.77
	Sweet Potato	1,250,084	7.36
	Outdoor Container/Field Grown Plants	1,001,320	5.89
B.	Commodity -Post Harvest Fumigations (total)	167,946	0.99
	<i>Top five use for commodity:</i>		
	Walnut (English Walnut, Persian Walnut)	54,689	0.32
	Fruits (Dried or Dehydrated)	23,255	0.14
	Grapes	20,940	0.12
	Cotton, General	20,100	0.12
	Storage Areas and Processing Equipment	11,708	0.07
C.	Structural Pest Control (total)	566,771	3.34
	<b>Grand Total (A + B +C)</b>	<b>16,992,896</b>	<b>100.00</b>

Table 3. Summary of usage in 1993 from the DPR database.

	Usage	Lbs MB	% Total
A.	Soil (total)	12,276,186	95.29
	<i>Top five uses for soil:</i>		
	Strawberry (All or Unspecified)	3,020,987	23.45
	Soil Appl., preplant outdoor (seedbeds, etc.)	1,206,515	9.37
	Outdoor Container/Field Grown Plants	1,075,246	8.35
	Carrots, General	811,955	6.30
	Almonds	739,713	5.74
B.	Commodity-Post Harvest Fumigations (total)	154,898	1.20
	<i>Top five uses for commodity:</i>		
	Walnut (English Walnut, Persian Walnut)	44,559	0.35
	Grapes	30,707	0.24
	Prunes	26,751	0.21
	Figs	18,064	0.14
	Commercial, Institutional, or Industrial Areas	7,194	0.06
C.	Structural Pest Control (total)	451,681	3.51
<b>Grand Total (A + B+ C)</b>		<b>12,882,765</b>	<b>100.00</b>

Table 4. Summary of usage in 1994 from the DPR database.

	Usage	Lbs MB	% Total
A.	Soil (total)	15,377,385	95.45
	<i>Top five uses for soil:</i>		
	Strawberry (All or Unspecified)	4,749,484	29.48
	Carrots (General)	1,234,229	7.66
	Grapes, Wine	1,215,443	7.54
	Preplant-Outdoor (Seedbeds, etc.)	951,655	5.91
	Outdoor Container/Field Grown Plants	870,981	5.41
B.	Commodity-Post Harvest Fumigations (total)	203,096	1.26
	<i>Top five uses for commodity:</i>		
	Walnut (English Walnut, Persian Walnut)	63,324	0.39
	Fruits (Dried or Dehydrated)	27,222	0.17
	Grapes	25,669	0.16
	Beans, Dried-Type	10,244	0.06
	Regulatory Pest Control	10,229	0.06
C.	Structural Pest Control (total)	529,252	3.29
<b>Grand Total (A + B + C)</b>		<b>16,109,733</b>	<b>100.00</b>

Table 5. Summary of usage in 1995 from the DPR database.

	Usage	Lbs MB	% Total
A.	Soil (total)	16,409,415	95.59
	<i>Top five uses for soil:</i>		
	Strawberry (All or Unspec)	4,807,068	28.00
	Uncultivated Agricultural Areas (All or Unspec)	1,351,162	7.87
	Outdoor Container/Field Grown Plants	1,118,650	6.52
	Preplant-Outdoor (Seedbeds, etc.)	1,050,123	6.12
	Grapes, Wine	1,014,388	5.91
B.	Commodity-Post Harvest Fumigations (total)	247,663	1.44
	<i>Top five uses for commodity:</i>		
	Walnut (English Walnut, Persian Walnut)	93,783	0.55
	Regulatory Pest Control	24,080	0.14
	Bushberries (bushfruits)	19,303	0.11
	Fruits (Dried or Dehydrated)	17,594	0.10
	Grapes	14,382	0.08
C.	Structural Pest Control (total)	508,869	2.96
<b>Grand Total (A + B +C)</b>		<b>17,165,946</b>	<b>100.00</b>

### **LABEL PRECAUTIONS/PERSONAL PROTECTIVE EQUIPMENT**

All MB products are classified as Toxicity Category I pesticides bearing a signal word "Danger/Poison." The general precautionary statements for MB read: *"Hazard to humans and domestic animals: Danger. Extremely hazardous liquid and vapor under pressure. Inhalation may be fatal or cause serious acute illness or delayed lung or nervous system injury. Do not breath vapors. Liquid or excessive vapor can cause serious skin or eye injury which may have a delayed onset. Do not get liquid on skin, in eyes, or on clothing."* If the product contains chloropicrin, it further gives these statements: *"This product contains chloropicrin as a warning odorant. Chloropicrin may be irritating to the upper respiratory tract, and even lower levels can cause painful irritation to the eyes, producing tearing. If these symptoms occur, leave the fumigation area immediately."*

The labels also give the following restrictions: *Do not fumigate with MB when soil temperature is below approximately 50 °F at 6 inches, do not wear jewelry, gloves, goggles, tight fitting clothing, rubber protective clothing, or rubber boots when handling. MB and chloropicrin are heavier than air and can be trapped inside clothing and cause skin injury.*

Product labels specify required personal protective clothing and equipment for workers. For example, applicators and other handlers must wear loose-fitting or well-ventilated long-sleeved shirt and long pants. The label requires respiratory protection when the air concentration level is above 5 ppm (20 mg/m<sup>3</sup>) at any time. DPR has established the target 24-hour TWA of 210 ppb (Nelson, 1992). The respiratory protection must be one of the following types: 1) a supplied air-respirator (MSHA/NIOSH approval number prefix TC-19C) or 2) a self-contained breathing apparatus (SCBA) (MSHA/NIOSH approval number prefix TC-13F). Under normal soil fumigation conditions, the concentration of MB in the working area will not generally exceed 5 ppm and no respiratory protection is required. However, there is a possibility of a spill or leak during soil fumigation. Therefore, respiratory protection of a type specified above must be available and will be required for entry into the affected area in the event of a leak or spill.

## HUMAN ILLNESSES

MB can cause serious human illness, especially when health protection and regulations are lax. In the past, MB was used as a refrigerant and a basic chemical in fire extinguishers. Some published literature revealed a history of serious illnesses caused by these uses or by accidental exposure to MB. Watrous (1942) reported a case where 33 out of 90 workers experienced mild systemic symptoms. These workers were involved in a packaging process where they placed liquid MB in glass ampoules, sealed the ampoules and inspected them for leakage. The air concentration of MB in the work area was generally less than 35 ppm. Workers experienced symptoms of anorexia, nausea, vomiting, headache, vertigo, difficulty in focusing the eye, lethargy, muscular pains, and dimness of vision. Johnstone (1944) reported 34 known cases of MB intoxication that developed in the date-packing industry. An estimated 15 to 20 more packers were absent from work for a period of two to 10 days. The maximum allowable air concentration of MB at that time was 50 ppm. The high level of exposure was caused by leakage coupled with poor aeration after fumigation. The majority of workers had neurologic disturbances involving vision, speech, tremors, and numbness of the extremities. There was a high incidence of mental confusion and some hallucinations. Depressive states lasted as long as five months. Other published reports revealed symptoms of different severity and fatalities among workers and residents (von Oettingen, 1946; Mezel *et al.*, 1948; MacDonald, *et al.*, 1950; Ingram, 1951; Rathus and Randy, 1961; Longley and Jones, 1965; Alexeeff and Kilgore, 1983). Even though current California laws and regulations regarding the use of MB are more stringent than those in the 1940's and 1950's, illnesses still occur as a result of exposure to MB from various uses.

The Pesticide Illness Surveillance Program (PISP) of DPR maintains credible records of illnesses caused by MB. In California, physicians are required to report any illness or injury they suspect of being related to pesticide exposure. Data in Table 6 shows illnesses associated with exposure to MB and MB in combination with other pesticides from 1991 to 1995 (Mehler, 1997).

Table 6. Occupational and non-occupational illnesses associated with exposure to MB and MB in combination with other pesticide in California (1991-1995).

MB alone	Illness/injury type				Total		
Activity	Systemic	Eye	Skin	Eye/skin	Def	Prob	Pos
1. Occupational (occup.)							
Fumigation, field	0	0	9	1	8	1	1
Fumigation, tarpaulin	3	0	0	0	0	1	2
Fumigation, chamber	8	0	0	0	2	4	2
Exposed to drift	12	0	0	0	2	0	10
Residue and other	4	0	1	0	2	0	3
Emergency response	8	0	0	0	2	3	3
Exposed to concentrate	2	0	0	0	0	2	0
Total occupational	37	0	10	1	16	11	21
2. Non-occupational							
Exposed to residues	14	3	0	0	1	15	1
Other	3	0	0	0	3	0	0
Total non-occupational	17	3	0	0	4	15	1
Occup. + non-occup.	54	3	10	1	20	26	22
Yearly average	10.8	0.6	2	0.2	4	5.2	4.4

MB in combination with other pesticides	Illness/injury type				Total		
Activity	Systemic	Eye	Skin	Eye/skin	Def	Prob	Pos
1. Occupational							
Fumigation, field	11	2	2	1	7	5	4
Fumigation, drift	7	1	0	0	1	5	2
Other residues	22	1	1	0	0	1	23
Emergency response	1	3	1	0	0	4	1
Total occupational	41	7	4	1	8	15	30
2. Non-occupational							
Exposed to drift or residue	27	3	0	0	0	22	8
Total non-occupational	27	3	0	0	0	22	8
Occup. + non-occup.	68	10	4	1	8	37	38
Yearly average	13.6	2.0	0.8	0.2	1.6	7.4	7.6

Def = definite; Prob = probable; Pos = possible.

The 5-year average illnesses associated with exposure to MB alone and MB in combination with other pesticides are 13.6 and 16.6 cases per year, respectively (Table 6). The overall average is 30.2 cases per year. This average includes cases classified as "possible," accounting for about 40% of the overall average. The "possible" classification indicates some correspondence between the MB exposure described and the illness/injury experienced; whereas, the "definite"

classification indicates the signs and symptoms exhibited by the affected person are such as would be expected to result from the exposure described. The "probable" classification indicates there is close correspondence between the pattern of exposure and the illness or injury experienced.

Affected people described a variety of illness/injury symptoms associated with exposure to MB alone or MB in combination with chloropicrin. Table 7 shows symptoms reported by affected people in California from 1986 to 1995 for "definite" relationship category.

Table 7. Symptoms described by patients exposed to MB alone and in combination with chloropicrin in California (1986-1995).

Illness/injury type	Observed symptoms*
Systemic/respiratory	Dizziness, lightheadedness, coughing, choking, nausea, headache, fever, shaking, sore throat, shortness of breath, vomiting, slurred speech, chest tightness and burning, disorientation, numbness on the cheek
Eye	Burning, irritation, tearing, double vision, itching, mild conjunctival inflammation, photophobia, moderate conjunctival irritation
Skin	Burning, pain, chemical burn, first and second degree burn, itching, painful swelling, redness, pruritic rash, blisters

\* symptoms are not arranged according to the degree of severity

### Evacuations after the use of MB

From 1982 to 1995, there were four evacuations of people after the use of MB and chloropicrin (Mehler, 1997; Richmond, 1997). Summary of evacuations are as follows:

1. An evacuation occurred after a field was treated with MB and chloropicrin. The investigative report indicated that the apparent cause for the concentration of fumigants over the evacuation area was the lack of wind and a temperature inversion during and after the application, causing poor wind dilution and dispersion. As a result, 35 people were seen at local hospitals during evacuation. Systemic symptoms were experienced by these people.
2. Seventy-one people at a labor camp were evacuated after a nearby nine-acre field was tarp fumigated. These people detected fumes and exhibited symptoms of exposure (tearing burning eyes). This incidence was caused by the gas leak. The seriousness of the gas leak involved two main factors, which were vandalism and poor wind movement.
3. Twenty-five people were evacuated from an area after four cylinders of MB fell off the pallet. One of the cylinders leaked gas. An employee was exposed and became lightheaded. Only this employee developed illness symptoms.
4. Approximately 100 people were evacuated from apartments when an adjacent apartment complex, which had been tarped and fumigated with MB, emitted white smoke from a vent pipe. It was found out later that the source of the smoke was the water heater closet in the back of the building. The Hazardous Materials Team later declared the building was free of toxic gases. There were no illness/injury from this incidence.



From the same period (1982-1995), PISP received 24 reports involving people (generally seeking shelter) who entered enclosed areas treated with MB. The atmosphere in these areas contained a lethal level of MB. Eighteen of the 24 people died.

## **DERMAL TOXICITY/SENSITIZATION**

Symptoms observed in illness incidents indicate that liquid MB can cause severe eye and skin burns. The DPR's database does not have any submitted reports on dermal sensitization studies. Given the acute dermal toxicity of MB liquid, a sensitization study is not feasible.

## **ANIMAL METABOLISM**

### 1. Excretion routes and rates

In rats after inhalation exposure, excretion occurred in exhaled air (about 50% of absorbed dose), urine (20%) and feces (1%) (Medinsky *et al.*, 1985). Urinary half-life was 9.9 hours. Excretion in the exhaled air was biphasic with a half-life of 4.1 hours in the initial phase and 17 hours in the second phase (Medinsky *et al.*, 1985). Other studies have shown similar results (Bond *et al.*, 1985, Jackot *et al.*, 1988). In dogs, only 5.7 and 0.7% of the inhaled dose were found in the urine and feces, respectively (Raabe, 1986).

In rats after oral exposure, 46% of the absorbed dose was found in the bile, 12% in the exhaled air, and 7% in the urine (Medinsky *et al.*, 1984). In rats after intraperitoneal administration, 65% of the dose was found in the exhaled air, 16% in the urine, and 1 % in the feces (Medinsky *et al.*, 1984).

### 2. Estimate of oral bioavailability

The percentages of dose absorbed are: About 50% for inhalation in rats (Medinsky *et al.*, 1985), 40% for inhalation in dogs (Raabe, 1986), 55% for inhalation in humans (Raabe, 1988), >90% for oral gavage in rats (Medinsky *et al.*, 1984), and >90% for intraperitoneal administration in rats (Medinsky *et al.*, 1984).

## **INHALATION UPTAKE/DERMAL ABSORPTION**

### **Inhalation uptake**

Inhalation uptake of MB was determined in beagle dogs (Raabe, 1986), in humans (Raabe, 1988), and in rats (Medinsky, 1985). Inhalation uptake of MB in adult nose-breathing beagle dogs was determined to be 39.8 percent (Raabe, 1986). In humans, the results were obtained from two males and two females in which uptake was evaluated by inhaling MB through mouth or nose. Means of the corrected inhalation uptake (observed uptake fraction x dead space

correction factor) when breathing by mouth and nose are 52.1 and 55.4 percent, respectively (Raabe, 1988). Inhalation uptake of MB (1.6-10 ppm) in rats was determined to be about 48 percent which is similar to inhalation uptake in beagle dogs and humans (Medinsky, 1985). Whenever it is necessary to estimate an absorbed dose from inhalation exposure, an inhalation absorption of 50% will be used. However, exposure estimates for MB in this document are shown as air concentrations instead of absorbed doses.

### **Dermal absorption**

The DPR library database showed an article titled "Absorption of MB through the intact skin (Jordi, 1953)." Upon reviewing this article, there was no actual dermal absorption study of MB as indicated by the title of the article. This article reported the incidence of one fatal and two non-fatal cases of poisoning, which occurred after the fumigation of a flour mill. Results of the investigation revealed that the workers wore oxygen-supplying apparatus and there was enough oxygen during the fumigation period. All workers experienced illness symptoms at least one hour after the fumigation, which took one hour and 30 minutes.

On March 26, 1985, Great Lakes Chemical Corporation submitted a request to the U.S. EPA for a waiver of dermal exposure data (TriCal, 1987). The registrant provided several reasons with the request. However, the U.S. EPA did not grant a waiver because the registrant provided insufficient evidence to the Agency for consideration. The registrant resubmitted a request after a meeting with the U.S. EPA personnel about the type of a closed system for MB application. The registrant claimed that workers would not be exposed to liquid MB under normal usage. Additionally, the only possible dermal exposure would come from a spill situation and under these conditions the inhalation route would still be the most important means of exposure (TriCal, 1987). Hence, a dermal absorption study is not needed for MB. On February 24, 1986, the agency granted the waiver of dermal exposure data based upon reasons that MB is applied in a closed system and the volatile nature of MB (boiling point = 4 °C). However, some questions still exist because there is a possibility that dermal absorption of MB is increased in areas with partly lipophilic character, such as armpit, groin, genitals, and the skin under the waist belt. This suggestion was substantiated by observations that skin lesions were limited to those areas where perspiration is relatively high (Zwaveling *et al.*, 1987). However, these effects are only observed with extremely high ambient MB concentrations.

Dermal exposure may be important for those exposure scenarios in which dermal contact is the primary source of exposure, such as for workers who wear respirators in areas with relatively high concentrations of MB. Based upon illness reports in the literature, there is the potential for significant dermal exposure of workers who wear self-contained-breathing apparatus (SCBA) in high MB concentration environment and work in the area for extended periods. Zwaveling *et al.* (1987) and Hezemans-Boer (1988) reported skin lesions in six workers eight hours after exposure for 40 minutes to high concentration of MB of approximately 40 g/m<sup>3</sup> or 10,000 ppm during the fumigation of an enclosed building. These workers wore coveralls on top of normal daily clothing, PVC gloves, and work shoes. During the actual fumigation, these workers breathed pressurized air from a portable container through a tight fitting facemask. The skin lesions consisted of sharply demarcated erythema with multiple vesicles and large bullae. The lesions were limited to parts of the skin that were relatively moist and/or subjected to mechanical

stress such as the armpits, the groin, the labia, the vulva, the penis, the scrotum, the rima ani, the navel, and the skin under the waistbelt. The mean plasma bromide concentration for samples collected immediately after the exposure and 12 hours after the exposure were  $95 \pm 15$  and  $72 \pm 24$   $\mu\text{mol/L}$ , respectively. It is possible that MB absorption is increased in this partly lipophilic (sebaceous glands) and partly hydrophilic (sweat glands) environment (Zwaveling et al., 1987). The percentage of dermal absorption could not be determined. Healing of the skin lesions of these workers occurred in 2 weeks. Deschamps and Turpin (1996) reported illnesses of two experienced fumigators who wore a cartridge respirator with activated charcoal. They entered a building where the concentration of MB was  $17\text{g/m}^3$ . Under the very high MB concentration environment, it is likely that the respirator was rapidly saturated with MB. It is for this reason that NIOSH does not recommend any air-purifying respirator for MB.

Dermal absorption of vapors of chemicals other than MB was studied. Four human volunteers (naked excepted shorts) were exposed to styrene vapors in the air within the concentration range of 1,300 to 3,200  $\text{mg/m}^3$  for 2 hours (Wieczorek, 1985). These volunteers (3 men and 1 woman aged 25-35) breathed pure air from outside through a respirator. The results showed that dermal absorption of the styrene vapors contributed about 5% to the amount absorbed in the respiratory tract under the same conditions when the subjects did not wear a respirator. Riihimaki and Pfaffli (1978) studied percutaneous absorption of xylene, styrene, toluene, 1,1,1-trichloroethane, and tetrachloroethane vapors employing restricted numbers of human volunteers ( $n = 2-3$  for each kind of vapor). The percutaneous absorption when the volunteers were exposed to moderate air concentrations of 300 and 600 ppm for 3.5 hours were about 0.1 to 2% of the amount estimated to be absorbed from the unprotected respiratory tract.

McDougal *et al.* (1985) studied dermal absorption of dibromomethane (DBM, 500 to 10,000 ppm) and bromochloromethane (BCM, 2,500 to 40,000 ppm) vapors in rats. The percentage of body burden, which was due to penetration of the skin, would be 5.8% for DBM and 4.2% for BCM. The observed permeability constants in rats for styrene, xylene, toluene, perchloroethylene, benzene, halothane, hexane, and isoflurane were estimated to be two to four times greater than the human permeability constants calculated from the available literature data (McDougal *et al.*, 1990). Based upon the difference in absorption of various chemical vapors in rats and humans, the percentage of body burden in humans was assumed to be 1.5 to 2.9% for DBM and 1.1 to 2.1% for BCM.

In conclusion, the dermal absorption of MB can be significant based upon reported illnesses of individuals with SCBA exposed to high concentration of MB for extended periods. Dermal exposures of other gases in humans such as styrene, xylene, styrene, toluene, 1,1,1-trichloroethane, tetrachloroethane, dibromomethane, and bromochloromethane can be in the range of 0.1-5% of the unprotected respiratory exposure. However, there is no chemical-specific dermal absorption study for MB; we cannot meaningfully estimate dermal exposure at this time.

## FARM COMMODITY RESIDUES

MB is used to fumigate fresh fruits, vegetables, and raw agricultural and processed food commodities. These treatments are needed to control pests and to comply with U.S. import requirements and quarantines of other nations. Applications are usually made to fresh produce before it is loaded for export or to harvested crops before they are processed further. If the raw or processed commodity is stored for an extended period of time, additional fumigations may be necessary to control infestations of Indian meal moth and other pests. MB applications are made by treating the whole structure containing the commodity, covering the commodity with tarps or placing the commodity in a fumigation chamber. The treatment is a function of the application rate of the gas (pounds (Lbs) of MB per 1,000 ft<sup>3</sup> of commodity or space being treated), temperature of the commodity, exposure time and the load factor (percentage of the chamber area filled by the commodity). After the exposure period has expired, the commodity is aerated to remove the gas. Aeration can be a passive where the chamber doors are left open or the tarps are removed to allow the gas to dissipate. It can involve active ventilation where fans are used to exhaust the gas from chambers or to blow through the treated commodity.

The data in the Table 8 were derived from studies concerning the fumigation of various commodities. MB residues were detected in treated commodities using the headspace analytical method (King *et al.*, 1981) with the exception of treated wheat which was analyzed using the derivative method (Fairall *et al.*, 1980), the reflux method (Malone, 1970) and FDA methodology (CDFA, 1984b). Half-lives were calculated for the rates of dissipation of the organic bromide residues remaining after each treatment. These values were derived from the linear regression analysis of the time versus residue data points presented in the studies. The natural log of 2 was divided by the rate constant (slope) to estimate the half-life from the start of aeration.

Table 8 shows commodities that are representative of general fumigations. This table also contains information indicating how physical conditions and aeration can affect the amount of organic bromide residues left in the treated commodity. The temperature at which the commodity was treated and subsequently aerated and stored was the primary factor in determining the rate of dissipation of MB residues left in the treated commodity. As demonstrated in the residue data for "cherries," the greater the temperature, the more rapid the dissipation rate as expressed in the shorter half-life. Commodities fumigated at lower temperatures had greater amounts of organic bromide residues at the start of aeration than those treated at the same rate, but at a higher temperature (example; "cherries" and "pistachio meats"). As expected, the amount of organic bromide residues remaining after a treatment was directly proportional to the amount of fumigant used and the exposure period as shown in the "avocado" and "pistachio meats" data.

Certain commodities hold residual MB longer than others due to the lipophilic nature of organic halides. As a consequence, MB gas will dissipate slower from raw nuts than fresh fruits. In the fumigation study of fresh cherries (Sell *et al.*, 1987), it was observed in the laboratory that the desorption rate was independent of the ventilation rates tested.

The majority of the studies were conducted in the laboratory with fumigation chambers ranging in size from 1-28 ft<sup>3</sup>, with almonds and walnuts fumigated in larger chambers (100-110 ft<sup>3</sup>). Only the strawberry and wheat studies involved sampling for MB residues under actual commercial usage. Studies were conducted to test the hypothesis that chambers of various sizes might produce different dissipation rates. There may be some reservations regarding the use of this data to estimate commercial use conditions. MB fumigation studies were conducted comparing commercial and laboratory treatments of commodities at the same rates. The concentrations of MB were monitored in chambers of various sizes (0.028-5,494 m<sup>3</sup>) during an inshell almond fumigation study (Hartsell *et al.*, 1992). The levels of fumigant from an application of 24 g/m<sup>3</sup> at 26 °C for four hours were similar at various times: 28.3 L (0.028 m<sup>3</sup>) chamber, 14.8-15.1 g/m<sup>3</sup> at 1.0 hour, 13.1-13.5 g/m<sup>3</sup> at 4 hours and the 5,494 m<sup>3</sup> chamber, 16.8 g/m<sup>3</sup> at 1.0 hour, 12.5 g/m<sup>3</sup> at 4 hours. A similar study was conducted during the fumigation and subsequent aeration of raisins (Hartsell *et al.*, 1992). The regression analysis of the data points derived comparable rate constants (slopes) for the dissipation rates for up to eight days for the lab and commercial chambers.

A 1975 study of tarp fumigations with in hull almonds in piles at the harvest site observed the temperature variability that occurs when commodities are fumigated outdoors (Nelson *et al.*, 1975). During the 24-hour fumigations, temperatures ranged from 69-79 °F at the bottom of the pile near the edge to 83-120 °F for one of the top corners at a depth of 1-2 feet. This temperature variability that occurs when commodities are tarp fumigated outdoors makes it difficult to predict the dissipation rate for the organic bromide residues.

Some studies investigated the effect of the commodity container on the dissipation rate of the MB. The almond fumigation study (Hartsell *et al.*, 1984b) researchers observed that wooden bins with slots cut in the sides allowed the MB gas to dissipate faster than bins with solid sides. Harris *et al.* (1983) found that polystyrene foam boxes desorbed larger quantities of MB gas compared to cartons constructed of wood or fiberboard. When a fumigation chamber (49.6 ft<sup>3</sup>) containing empty polystyrene foam grape boxes was fumigated, aerated and resealed, MB levels reached a maximum of 3.0 g/m<sup>3</sup>. Sinclair and Lindgen (1952) noted that during the fumigation of empty flats for packing avocados, the excelsior packing material absorbed 20% of the applied MB in the chamber.

Table 8. A log-linear regression analysis of residue data over time from MB chamber fumigation of various commodities.

Crop	Fumigation method				Storage temp. (°C)	Rate constant <sup>b</sup>	Residues at aeration <sup>c</sup> (ppm)	t <sub>1/2</sub> <sup>d</sup> (hours)
	Rate <sup>a</sup>	Time (hr)	Temp. (°C)	% Load				
In shell almonds (shells)	1	12	10	70-75	n/a	-0.054	46.7	12.8
In shell almonds (shells)	1	8	15.6	70-75	n/a	-0.051	17.3	13.6
In shell almonds (shells)	1	4	26.7	70-75	n/a	-0.044	15.5	15.7
In shell almonds (meats)	1	12	10	70-75	n/a	-0.018	9.5	38.4
In shell almonds (meats)	1	8	15.6	70-75	n/a	-0.027	4.4	26.4
In shell almonds (meats)	1	4	26.7	70-75	n/a	-0.023*	4.9	31.2
Almond meats in cartons	1	8	15.6	70-75	n/a	-0.047	13.4	14.8
In shell walnuts (meats) <sup>e</sup>	3.5	4	15.6	50-55	1.7	-0.127	56.5	132
In shell walnuts (meats) <sup>e</sup>	3.5	4	15.6	50-55	10	-0.162	50.2	103.2
In shell walnuts (meats) <sup>e</sup>	3.5	4	15.6	50-55	32	-0.563	31.0	28.8
Fresh strawberries <sup>f</sup>	3	3	18.3	n/r	n/a	-1.149	26.4	0.60
Fresh strawberries <sup>g</sup>	3	3	18.3	n/r	1.1	-0.037*	n/a	18.7
Lemons	2.75	2	21	50	10	-0.021	2.2	33
Grapefruit	4	2	20	80	24	-0.085	26.8	8.2
Wheat in storage	1.5	24	21	100	21	-0.035*	0.111	19.8
Wheat in storage	1.5	24	21	100	21	-0.049*	0.519	14.2
Wheat in storage	1.5	24	21	100	21	-0.087*	0.648	8.0
Wheat in storage	1.5	24	21	100	21	-0.061	1.149	11.3
Avocados (hass) whole fruit	2	2	20	40	22	-0.108*	3.0	6.4
Avocados (hass) whole fruit	2	4	20	40	22	-0.112*	4.4	6.2
Cherries	3	2	3	32	3	-0.296	83.5	2.3
Cherries	3	2	9	32	9	-0.398	76.0	1.7
Cherries	3	2	23	32	23	-0.636	59.2	1.1
In shell pistachio meats <sup>h</sup>	1	24	15.5	80	15.5	-0.016	12.5	62.5
In shell pistachio meats <sup>h</sup>	1.5	24	15.5	80	15.5	-0.014	20.6	49.5
In shell pistachio meats <sup>h</sup>	1.5	24	26.6	80	26.6	-0.013	10.6	53.3
In shell pistachio meats <sup>h</sup>	3.5	24	26.6	80	26.6	-0.014	20.1	49.5
Peaches	3	3	21	50-60	2.5	-0.168*	15.4	4.1
Plums	3	3	21	50-60	2.5	-0.045	34.1	15.4
Pears	3	3	21	50-60	2.5	-0.047	22.7	14.8
Raisins	1.5	24	10	50	10	-0.005	1.3	139
Dried apricots in bulk	1.5	24	10	50	10	-0.023	4.1	30.1
Dried apricots in packages	1.5	24	10	50	10	-0.011	7.3	63
Nonpitted prunes in bulk	1.5	24	10	46	10	-0.018	4.8	38.5
Pitted prunes in bulk	1.5	24	10	46	10	-0.018*	4.9	38.5
Brown rice in 2 lb boxes	1.5	16	21	not known	21	-0.046*	143.0	15.0
Milled rice in 2 lb boxes	1.5	16	21	not known	21	-0.064*	1.9	10.8

n/a-not applicable or no data available; n/r-not reported

Table 8 (cont.). A log-linear regression analysis of residue data over time from MB chamber fumigation of various commodities.

- \* the regression performed for this crop was found to be insignificant (with P-value >0.05).
- <sup>a</sup> pounds MB per 1,000 ft<sup>3</sup>.
- <sup>b</sup> same as the regression coefficient (slope of the regression line) for natural log of MB concentration as a function of time.
- <sup>c</sup> estimated residues at start of aeration. Residues were calculated based on y-intercept of the regression line.
- <sup>d</sup> half-life ( $t_{1/2}$ ) =  $\log 2 / \text{rate constant}$ .
- <sup>e</sup> fumigated at reduced pressure of 100 mm Hg.
- <sup>f</sup> calculated as the mean from two replications.
- <sup>g</sup> calculated with 1.0 ppb as 50% of the minimum detectable level.
- <sup>h</sup> mean value of residues after three sequential treatments made at the listed rate, 20 days apart.

The following list cites the authors of the studies for each of the commodities listed in the Table 9.

- |  |   |
|--|---|
| 1. almonds-Hartsell <i>et al.</i> , 1984b.   | 9. pears-Tebberts <i>et al.</i> , 1983.     |
| 2. pistachios-Hartsell <i>et al.</i> , 1986. | 10. plums-Tebberts <i>et al.</i> , 1983.    |
| 3. walnuts-Hartsell <i>et al.</i> , 1984a.   | 11. strawberries-CDFA, 1984a.               |
| 4. avocados-Singh <i>et al.</i> , 1982.      | 12. wheat-CDFA, 1984b.                      |
| 5. cherries-Sell <i>et al.</i> , 1987.       | 13. lemons-Soderstrom <i>et al.</i> , 1991. |
| 6. grapefruit-King <i>et al.</i> , 1981.     | 14. apricots-Hartsell <i>et al.</i> , 1992. |
| 7. prunes-Obenauf, 1992.                     | 15. rice-Anonymous, 1992.                   |
| 8. peaches-Tebberts <i>et al.</i> , 1983.    | 16. raisins-Hartsell <i>et al.</i> , 1992.  |

Several fumigation trials observed the MB residues remaining in commodities when two different percents of load (10% versus 50%) were used in the chamber for the same treatment (Hartsell *et al.*, 1992). A t-test of the differences in residues from the two load factors indicated that the percent load may affect the amount of residues remaining in the fumigated commodity. However, the t-test may not be an appropriate method for determining if the difference is significant because the samples were not randomly taken.

The treatment conditions described in Table 8 for strawberries are typical for commercial treatments as indicated in a survey conducted by the Strawberry Advisory Board (Riggs, 1992). The almond study results in Table 9 are supported by research conducted by Hartsell *et al.* (1988) for the Almond Board of California.

Table 9. A log-linear regression of dissipation rates for MB residues and temperature by almond.

Crop	Treatment method	Intercept	Slope of regression <sup>a</sup>	Coefficient of determination ( $r^2$ )
In shell almonds (shells) <sup>b</sup>	chamber	-5.058	691.43	0.996

<sup>a</sup> based on the Arrhenius equation  $\log(\text{rate constant}) = a + b(1/K)$ , where rate constant is taken from Table 8 and K is temperature in degree Kelvin.

<sup>b</sup> fumigated at reduced pressure of 100 mm Hg.

## EXPOSURE ASSESSMENT

MB exposure estimates include those for workers during fumigation of preplant soil, agricultural commodities, or structures as well as for residents who live in or near fumigated residences and residents who live at an established buffer zone of commodity fumigation. Air concentrations of MB at specified periods are shown as parts per billion (ppb) or parts per million (ppm) by volume whenever they are appropriate.

The exposure estimates are grouped into acute and non-acute exposures depending on the nature of each work task or exposure scenario. Acute exposure is the exposure that occurs daily or within 24 hours. Non-acute exposures, as used in this document, are those exposures that occur in these exposure periods: 7 days (subacute), 90 days (subchronic), and 365 days (chronic) (Sanders, 1998). Frequency and duration of exposure for each work task or exposure scenario are used to determine whether the exposure is an acute or non-acute. These exposure scenarios also reflect toxicological endpoints observed in experimental animals as determined by DPR.

Calculations of exposure rely on factors, including application rates, work periods specified in the current California permit conditions, frequency and duration of exposure. Types of tarpaulins, application equipment, and injection depth are used in the permit conditions to determine the maximum daily work time for each type of soil injection fumigation. DPR has requested registrants to provide frequency and duration of exposure for acute and non-acute exposures (Donahue, 1997). So far, registrants have provided some data as requested. Consequently, default frequency and duration of exposure for many exposure scenarios were generated from data obtained from various sources and the use of professional judgment (Haskell, 1998a, 1998b). These default values are shown in Appendix A.

As shown in the previous section on formulations, many methyl bromide products contain chloropicrin. However, exposure assessment of chloropicrin has not been initiated at this time. This chemical has been placed in a high priority list under the Birth Defect Prevention Act of 1984 (SB 950). The exposure assessment may be initiated depending on the priority of the Department's risk assessment.



### Exposure calculation procedures

MB exposure estimates are calculated for acute and non-acute exposures for applicable exposure scenarios. In each case, the air concentration is shown as the 24-hour TWA. (*Notes:* Lbs a.i. as used in this document is equivalent to Lbs MB unless mentioned otherwise. Lbs formulated product may include only MB or MB and chloropicrin.)

#### a) Acute exposures

Procedures used to estimate the 24-hour TWA concentration are as follows:

a.1) Volume of air sample at standard temperature and pressure of 25 °C and 760 mm Hg

$$VS = \frac{V \times P \times 298}{760 \times (T + 273)}$$

Where: VS = volume of air (L) at standard conditions  
V = volume of air sample (L) as measured  
P = measured barometric pressure in mm Hg  
T = measured temperature of air in °C

a.2) Calculation of MB concentrations (ppm) in air

$$\text{MB (ppm)} = \frac{\mu\text{g} \times 24.45}{VS \times 94.94} = \frac{\mu\text{g} \times 0.2576}{VS}$$

Where: One mole of MB occupies 24.45 liters at 25 °C and the molecular weight is 94.94.

a.3) Conversion of MB from  $\mu\text{g}/\text{m}^3$  to ppb and vice versa

$$\begin{aligned} 1 \text{ ppb} &= \frac{24.45}{94.94} \times \mu\text{g}/\text{m}^3 = 0.26 \mu\text{g}/\text{m}^3 \\ 1 \mu\text{g}/\text{m}^3 &= \frac{94.94}{24.45} \times \text{ppb} = 3.88 \text{ ppb} \end{aligned}$$

a.4) Calculation of the 24-hour TWA concentration

$$\text{TWA} = \frac{C_1 T_1 + C_2 T_2 + C_n T_n}{24 \text{ hours}}$$

Where: TWA = MB concentration (ppb, ppm,  $\mu\text{g}/\text{m}^3$ , or  $\text{mg}/\text{m}^3$ )  
C = concentration of MB during an increment of exposure  
T = incremental exposure time

#### b) Non-acute exposures

The non-acute exposure estimates shown in this document represent subacute, subchronic, and chronic exposures. The underlying reason for non-acute exposure is that workers or residents may be exposed to airborne MB either continuously or intermittently for longer than 24 hours. The duration and frequency of exposures for non-acute exposures were used to estimate exposure. Exposure for the subacute or subchronic period is that period during the maximum or peak use of MB for any fumigation purposes. Basically, the non-acute exposure estimates are determined from daily exposures either as acute, subchronic, or chronic exposure as shown below.

$$\text{Non-acute exposure estimate (ppb)} = \frac{\text{Daily exposure (ppb)} \times \text{Days of exposure (days)}}{\text{Exposure period (7, 90 or 365 days)}}$$

Notes:

1. Daily acute, subchronic or chronic exposure is shown as the 24-hour TWA (Tables 13-34 and 37-38).
2. Days of exposure for subacute, subchronic or chronic exposure are shown in Appendix A and also in Table 11.
3. Default exposure periods for subacute, subchronic, and chronic are 7, 90, and 365 days, respectively.

#### **Definitions:**

The "**High Barrier**" tarpaulin must have a permeability factor of less than 8 milliliters MB per hour, per square meter, per 1,000 ppm of MB under tarp at 30 °C. Any polyethylene tarp of 6-mil thickness or greater meets this criterion.

The "**Very High Barrier**" tarpaulin must have a permeability factor of less than 5 milliliters MB per hour, per square meter, per 1,000 ppm of MB under tarp at 30 °C.

"n/a" means not applicable.

#### **Availability of worker exposure studies:**

Before 1992 studies were conducted using then-current soil injection equipment which often resulted in high air concentrations of MB near the worker's breathing zone. Subsequently, DPR required registrants to conduct many exposure studies in order to determine short-term air concentrations of MB in various uses and exposure scenarios. Starting in 1992, registrants of MB conducted exposure monitoring studies during the fumigation of preplant soil, agricultural commodities, and other structures. Submitted reports indicate that many studies were not conducted in compliance with Good Laboratory Practice (GLP) standards as indicated in 40 CFR 160 (U.S. EPA, 1998). The main reason why these studies were not in GLP compliance because there was no valid field or laboratory fortification recovery study.

#### a) Summary of MB exposure studies conducted before 1992

In 1987, TriCal, Inc. submitted reports of several worker exposure studies (TriCal, 1987). The first data set consisted of exposure data generated during fumigations of a flour mill, processing and handling silo, grain silo, shipping container, transportation vehicle (barge loaded with oak logs), furniture covered with tarpaulin, and flat storage fumigation (corn, soybeans). The studies

were conducted based on NIOSH method No. S372. Air samples were collected from the worker's breathing zone using a sampling train that consisted of two 600 mg coconut shell charcoal sampling tubes and a personal air sampling pump. The principle of quality control/quality assurance was observed during the studies. The analytical recovery for MB ranged from 95 to 117%. Results were reported as the 8-hour TWA (Table 10). The application rates for most uses were not noted, but the report indicated that label instructions were followed.

Table 10. Air concentrations of MB near the worker's breathing zone.

Type of fumigation	Work task	n	8-hr TWA (ppm) Average $\pm$ SD (range)
1. Flour mill			
a) Applicators opened gas tanks located inside the building.	Applicators	9	4.1 $\pm$ 4.4 (0.04-13)
	Aerators	7	7.8 $\pm$ 6.9 (0.01-15)
	Tape removers	1	0.4
b) Applicators opened gas tanks located outside the building.	Applicators	4	0.2 $\pm$ 0.27 (0.06-0.61)
	Aerators	3	5.5 $\pm$ 7.3 (1.1-14)
2. Processing and handling silo (enclosed conveyer and storage bins)	Applicators	3	7.3 $\pm$ 5.0 (2.7-12.6)
	Aerators	2	0.07 (0.03 and 0.1)
3. Grain silo, elevator, or bin	Applicators	3	0.5 $\pm$ 0.1 (0.4-0.6)
	Aerators	3	0.2 (ND)
	Grain loaders	2	0.2 (ND)
4. Shipping containers (trailers or rail cars)	Applicator	1	0.02
	Aerator	1	6.8
5. Transportation vehicle (barge loaded with oak logs)	Applicator	3	0.6 $\pm$ 0.3 (0.05-0.9)
	Supervisor	1	0.04
	Inspectors	1	0.02
	Aerators	2	16.1 (7.1 and 25)
	Tarp removers	2	0.4 (0.3 and 0.5)
6. Tarpaulin (wooden furniture and a pallet of flour)	Applicators	2	0.1
	Tarp remover	1	0.2
	Aerator	1	1.3
7. Flat storage building (filled to the ceiling with corn, soybeans)	Applicator	3	0.25 $\pm$ 0.1 (0.2-0.3)
	Helpers	2	0.1 (0.02 and 0.2)
	Aerators	2	0.1 (0.02 and 0.2)

n = number of replicates. Minimum detectable level (MDL) ranged from 0.01 to 0.4 ppm depending on sample volume; one-half of the MDL was used whenever the result indicated "non-detects (ND)."

TriCal, Inc. also conducted worker exposure studies to determine exposures of tractor drivers and co-pilots to MB during tarpless bed fumigation (TriCal, 1990). Application rates ranged from 50 to 360 pounds MB per acre and the injection depth ranged from 4 to 18 inches under the soil surface. Air concentrations at various distances from treated fields were also measured. The application of MB in these studies presumably used unmodified application equipment, unlike those currently used to reduce worker exposure. Exposure ranges (ppm) for drivers obtained from

four studies were 0.009-1.500 (carrots), 2.952-4.772 (potatoes), 0.648-1.704 (seedbed), and 1-2.1 (broccoli), and those for co-pilots were 0.270-1.524 (carrots), and 2.544-3.212 (seedbed). These air concentrations are high compared to the current target exposure level of 210 ppb for acute toxicity. The downwind air concentrations, measured 60 to 200 feet from treated fields, ranged from 0.03-0.211 ppm.

TriCal, Inc. also submitted several other studies that measured MB air concentrations near the worker's breathing zone (TriCal, 1987). These studies are listed below:

1. Deep tarpless application, Wasco, California. April 2, 1986. DPN 123-099, record number 64750.
2. Deep tarpless application, Delano, California. May 30, 1986. DPN 123-099, record number 64750.
3. Tarped field fumigation, Ducor, California. April 2, 1984. DPN 123-099, record number 64750.
4. Driscoll chamber fumigation, Watsonville, California. March 26, 1984. DPN 123-099, record number 64750.
5. Driscoll chamber fumigation (strawberries for export), Watsonville, California. July 18, 1984. DPN 123-099, record number 64750.
6. A study of the inhalation exposure of workers to MB and chloropicrin during preplant soil fumigations (shallow injection) in 1982 - A preliminary report. DPN 123-099, record number 64751 (or HS-1076, June 10, 1983, DPR).
7. A study of the inhalation exposure of workers to MB during preplant soil fumigations (shallow injection) in 1980 and 1981. DPN 123-099, record number 64752 (or HS-900, May 20, 1982, DPR).
8. A study of the levels of MB and chloropicrin in the air downwind from a field during and after a preplant soil fumigation (shallow injection)-A preliminary report. DPN 123-099, record number 64753 (or HS-1061, April 15, 1983, DPR).

Results from these studies are not employed for estimation of worker exposure due to one or more reasons listed below.

1. The report does not contain adequate information concerning fumigation method, sample collection and processing, and analysis (QA/QC) to ensure correct calculation of the TWA air concentrations.
2. The study used unacceptable analytical method.
3. There are better studies conducted in and after 1992.
4. The older studies do not reflect current work practices.

#### b) Summary of MB exposure studies conducted in and after 1992

Exposure estimates from studies conducted in and after 1992 are summarized in Table 11. These exposure estimates are shown as acute, subacute, subchronic and chronic exposure. Details of the exposure studies are presented in Appendices B, C, and D. Factors concerning frequency and duration of exposure for various work tasks and exposure scenarios are shown in Appendix A.

Table 11. Acute and non-acute exposure estimates of persons in California to methyl bromide\*.

Number/ Type of application	Acute exposure (ppb)			Subacute exp. (ppb)			Subchronic exp. (ppb)			Chronic exp. (ppb)		
	/24-hour period			/7-day period			/90-day period			/365-day period		
	Avg.	STDEV	Range	Days	Avg.	STDEV	Days	Avg.	STDEV	Days	Avg.	STDEV
1. Shallow shank-tarped soil injection fumigation (T.13; 1.a) Applicators: Noble plow shanks	111	98	3-303	6	95	84	40	49	44	n/a	n/a	n/a
2. Shallow shank-tarped soil injection fumigation (T.14; 1.a) Co-pilots: Noble plow shanks	224	152	34-518	6	192	130	40	100	68	n/a	n/a	n/a
4. Shallow shank-tarped soil injection fumigation (T.15; 1.a) Shovelmen: Noble plow shanks (by growers)	147	135	52-515	3	63	58	n/a	n/a	n/a	n/a	n/a	n/a
5. Shallow shank-tarped soil injection fumigation Tarp removers (by PCOs) (T.16; 1.a)	835	596	3-1659	5	596	426	55	510	364	n/a	n/a	n/a
Tarp removers (by growers) (T.17; 1.a)	278	199	1-553	2	79	57	n/a	n/a	n/a	n/a	n/a	n/a
6.a Deep shank injection fumigation (T.18; 1.b) Applicators	154	n/a	126&181	6	132	n/a	40	68	n/a	n/a	n/a	n/a
Co-pilots	49	n/a	n/a	6	42	n/a	40	22	n/a	n/a	n/a	n/a
Cultipacker	99	n/a	n/a	6	85	n/a	n/a	n/a	n/a	n/a	n/a	n/a
6.b Improved deep shank injection fumigation (T.18; 1.b) Applicator	57	n/a	n/a	6	49	n/a	40	25	n/a	n/a	n/a	n/a
Cultipacker	70	n/a	n/a	6	60	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7. Deep shank injection fumigation (T.19; 1.c) Appl: Basic + a second tractor with a disc	88	n/a	n/a	6	75	n/a	40	39	n/a	n/a	n/a	n/a
Disc driver: Basic + a 2nd tractor with a disc	512	n/a	n/a	6	439	n/a	40	228	n/a	n/a	n/a	n/a
Applicator: Basic + a cultipacker	94	n/a	22&165	6	81	n/a	40	42	n/a	n/a	n/a	n/a
Supervisor: Basic + a cultipacker	67	n/a	n/a	6	57	n/a	40	30	n/a	n/a	n/a	n/a
Cultipack.: Basic + a cultipacker (by growers)	34	n/a	10&58	6	29	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8. Deep shank injection fumigation (T.20; 1.d) Applicator: With 4 forward curved shanks	7	n/a	n/a	6	6	n/a	40	3	n/a	n/a	n/a	n/a
Cultipack: 4 forward curved shanks (grower)	7	n/a	n/a	6	6	n/a	n/a	n/a	n/a	n/a	n/a	n/a

\* subchronic and chronic exposure estimates were calculated based upon daily 24-hour TWA for subchronic and chronic exposures shown in tables 13-31 and 38.

Only subacute exposure (Numbers 20, 22, and 23 corresponding to Tables 32, 34, and 37) were calculated from acute exposure. Acute exposures during aeration of fumigated houses (Number 21 or Table 33) was assumed. Duration and frequency of exposure are shown in Appendix A.

Notes: 1. A standard deviation (STDEV) was not calculated when there were only two exposure values; the exposure data are shown as "xx&xxx."

2. T. = Table; exp. = exposure; by growers or PCOs = employed by growers or PCOs; Avg. = average; conv. = conventional; inj. = injection; Tr. = tractor.

Table 11 (continued 1). Acute and non-acute exposures of persons in California to methyl bromide\*.

Number/ Type of application	Acute exposure (ppb)			Subacute exp. (ppb)			Subchronic exp. (ppb)			Chronic exp. (ppb)		
	/24-hour period			/7-day period			/90-day period			/365-day period		
	Avg.	STDEV	Range	Days	Avg.	STDEV	Days	Avg.	STDEV	Days	Avg.	STDEV
9. Shallow shank-tarped bed fumigation (T.21; 1.e)												
Appl: Conv.+ raised platform and inj. 8"	80	n/a	n/a	6	69	n/a	40	36	n/a	n/a	n/a	n/a
Co-pilots: Conv.+ raised platform&inj. 8"	104	n/a	98&111	6	89	n/a	40	46	n/a	n/a	n/a	n/a
Applicators: Conv. + closing shoes	44	n/a	n/a	6	38	n/a	40	20	n/a	n/a	n/a	n/a
Co-pilots: Conv. + closing shoes	167	n/a	125&209	6	143	n/a	40	74	n/a	n/a	n/a	n/a
10. Shallow shank tarped-bed fumigation (T.22; 1.f)												
Driver: Tr. was equipped for fum. (by PCOs)	28	n/a	n/a	6	24	n/a	40	12	n/a	n/a	n/a	n/a
Appl: Tractor was equipped for MB fum.	45	n/a	n/a	6	39	n/a	40	20	n/a	n/a	n/a	n/a
Tape layer: Tr. was equipped for MB fum.	65	n/a	n/a	3	28	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Driver: Tractor was equipped for laying tarp	4	n/a	n/a	6	3	n/a	40	1.8	n/a	n/a	n/a	n/a
Co-pilot: Tr was equipped for laying tarp	34	n/a	4&65	6	29	n/a	40	15	n/a	n/a	n/a	n/a
11. Shallow shank, tarped-bed fumigation (T.23; 1.g)												
Applicator	3	n/a	n/a	6	3	n/a	40	1	n/a	n/a	n/a	n/a
Co-pilot	31	n/a	31&31	6	27	n/a	40	14	n/a	n/a	n/a	n/a
Shovelman (by growers)	0.6	n/a	0.6&0.6	3	0.3	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Pipe layer (by growers)	2	0	2-2	3	1	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Irrigation pipe tractor driver (by growers)	411	477	1-918	3	176	204	n/a	n/a	n/a	n/a	n/a	n/a
12. Tarp shallow with Noble plow shanks (T.24; 1.h)												
Cutter: From broadcast appl. (by growers)	82	134	3-237	2	23	38	n/a	n/a	n/a	n/a	n/a	n/a
Cutter: From broadcast appl. (by PCOs)	82	134	3-237	5	59	96	30	27	45	n/a	n/a	n/a
Puller: From broadcast appl. (by growers)	33	92	3-324	2	9	26	n/a	n/a	n/a	n/a	n/a	n/a
Puller: From broadcast appl. (by PCOs)	33	92	3-324	5	24	66	30	11	31	n/a	n/a	n/a
13. Tarp shallow with Noble plow shanks (T.25; 1.i)												
From use of high barrier (HB) tarp												
Cutter: By PCOs	78	n/a	n/a	5	56	n/a	30	26	n/a	n/a	n/a	n/a
Remover: Tractor driver (by PCOs)	343	n/a	n/a	5	245	n/a	30	114	n/a	n/a	n/a	n/a
Remover: Basketman (by PCOs)	325	n/a	n/a	5	232	n/a	30	108	n/a	n/a	n/a	n/a
Remover: End puller (by PCOs)	7	n/a	n/a	5	5	n/a	30	2	n/a	n/a	n/a	n/a
Cutter (by growers)	78	n/a	n/a	5	56	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Remover: Tractor driver (by growers)	343	n/a	n/a	5	245	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Remover: Basketman (by growers)	325	n/a	n/a	5	232	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Remover: End puller (by growers)	7	n/a	n/a	5	5	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Table 11 (continued 2). Acute and non-acute exposures of persons in California to methyl bromide\*.

Number/ Type of application	Acute exposure (ppb)			Subacute exp. (ppb)			Subchronic exp. (ppb)			Chronic exp. (ppb)		
	/24-hour period			/7-day period			/90-day period			/365-day period		
	Avg.	STDEV	Range	Days	Avg.	STDEV	Days	Avg.	STDEV	Days	Avg.	STDEV
14. Nursery potting soil fumigation (T.26; 2.a)												
Applicators	21	n/a	17&26	1	3	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Applicator assistants	16	n/a	1&31	1	2	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Tarp removers	94	38	43-133	1	13	5	n/a	n/a	n/a	n/a	n/a	n/a
Tractor drivers	16	n/a	1&31	1	2	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Truck drivers	3	4	1-8	1	0.4	0.6	n/a	n/a	n/a	n/a	n/a	n/a
Potters	32	43	2-95	1	5	6	n/a	n/a	n/a	n/a	n/a	n/a
15. Greenhouse soil fumigation (T.27; 2.b)												
Applicators	562	n/a	401&724	1	80	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Tarp venters	93	160	0.6-333	1	13	23	n/a	n/a	n/a	n/a	n/a	n/a
Tarp removers	1	1	0.2-2	1	0.1	0.1	n/a	n/a	n/a	n/a	n/a	n/a
16. Fumigation of grain products (chambers, vans, etc.) (T.28; 3)												
Fumigation applicator												
Applicator	1652	1462	792-3340	5	1180	1044	45	895	792	180	679	601
Initiation of aeration of sea containers/truck trailers												
Aerator	6039	4062	1349-8458	5	4314	2901	45	3271	2201	180	2482	1669
Initiation of aeration of tarpaulin fumigation												
Aerator	251	411	14-726	5	179	294	45	136	223	180	103	169
Emptying sea containers/truck trailers												
Forklift driver	16	24	2-43	5	11	17	45	4	6	180	4	6
Emptying non-certifying fumigation chambers												
Forklift driver	6	2	4-8	5	4	1	45	2	1	180	1	0.5
Air monitoring in fumigated rice warehouse												
Ambient air	32	n/a	10&55	5	23	n/a	45	16	n/a	180	16	n/a
Reprocessing fumigated rice products												
Workers	10	0	10-10	5	7	0.0	n/a	n/a	n/a	n/a	n/a	n/a
17. Fumigation of dried fruit and tree nut products (T.29; 4)												
a) Sea Van												
Fumigator	33	n/a	n/a	2	9	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Fumigator observer	9	n/a	n/a	2	3	n/a	n/a	n/a	n/a	n/a	n/a	n/a
15-ft downwind	3	n/a	2&4	2	0.9	n/a	n/a	n/a	n/a	n/a	n/a	n/a
b) Chamber (dried prunes):												
Forklift operator	0.35	n/a	n/a	3	0.2	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Fumigators	938	n/a	n/a	3	402	n/a	n/a	n/a	n/a	n/a	n/a	n/a
1 meter from open door	0.78	n/a	n/a	3	0.3	n/a	n/a	n/a	n/a	n/a	n/a	n/a
2 m from chamber	141	n/a	n/a	3	60	n/a	n/a	n/a	n/a	n/a	n/a	n/a
15 m from chamber	5	n/a	n/a	3	2	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Leak check, side seal of chamber	13281	n/a	n/a	3	5692	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Table 11 (continued 3). Acute and non-acute exposures of persons in California to methyl bromide\*.

Number/ Type of application	Acute exposure (ppb)			Subacute exp. (ppb)			Subchronic exp. (ppb)			Chronic exp. (ppb)		
	/24-hour period			/7-day period			/90-day period			/365-day period		
	Avg.	STDEV	Range	Days	Avg.	STDEV	Days	Avg.	STDEV	Days	Avg.	STDEV
c) Big chamber fumigation (raisins):												
Primary fumigator	800	n/a	n/a	5	571	n/a	60	445	n/a	170	311	n/a
Secondary fumigator	118	n/a	n/a	5	84	n/a	60	65	n/a	170	46	n/a
Aerators	490	n/a	55&925	5	350	n/a	60	272	n/a	170	190	n/a
Forklift drivers	49	19	31-69	5	35	14	60	26	10	170	18	7
Catchall operator	203	n/a	n/a	5	145	n/a	60	135	n/a	170	95	n/a
Hopper operators	160	n/a	93&227	5	114	n/a	60	107	n/a	170	75	n/a
Capper dumper	127	n/a	n/a	5	91	n/a	60	85	n/a	170	59	n/a
Inspector	15	n/a	n/a	5	11	n/a	60	10	n/a	170	7	n/a
Moisture checker	9	n/a	n/a	5	6	n/a	60	6	n/a	170	4	n/a
Forklift to side hopper	8	n/a	n/a	5	6	n/a	60	4	n/a	170	3	n/a
Stem pickers	22	6	16-28	5	16	4	60	15	4	170	10	3
Packer 1	19	n/a	n/a	5	14	n/a	60	13	n/a	170	9	n/a
Area samples:												
Shed-Green forklift	117	n/a	n/a	5	84	n/a	60	62	n/a	170	43	n/a
Shed-Blue tractor	173	n/a	n/a	5	124	n/a	60	92	n/a	170	64	n/a
Aeration-sheds 604-606	1292	780	700-2175	5	923	557	60	717	433	170	501	303
Capper area	280	n/a	n/a	5	200	n/a	60	187	n/a	170	130	n/a
Hopper area #2	61	n/a	n/a	5	44	n/a	60	41	n/a	170	28	n/a
Catchoff area	127	n/a	n/a	5	91	n/a	60	85	n/a	170	59	n/a
Side hopper area	23	n/a	n/a	5	16	n/a	60	15	n/a	170	11	n/a
Stem picker area-A	10	n/a	n/a	5	7	n/a	60	7	n/a	170	5	n/a
Filer area, E-line	19	n/a	n/a	5	14	n/a	60	13	n/a	170	9	n/a
d) Chamber (raisins):												
Fumigators	63	n/a	19&107	6	54	n/a	63	44	n/a	150	17	n/a
Aerators	47	n/a	30&64	6	40	n/a	63	33	n/a	150	13	n/a
Clear chambers 1-2	1434	n/a	1406&1463	6	1229	n/a	63	1004	n/a	150	393	n/a
Stem pickers	28	n/a	26&30	6	24	n/a	63	20	n/a	150	12	n/a
Forklift driver	3	n/a	n/a	6	3	n/a	63	2	n/a	150	0.4	n/a
Hopper operator	19	n/a	n/a	6	16	n/a	63	13	n/a	150	8	n/a



Table 11 (continued 4). Acute and non-acute exposures of persons in California to methyl bromide\*.

Number/ Type of application	Acute exposure (ppb)			Subacute exp. (ppb)			Subchronic exp. (ppb)			Chronic exp. (ppb)		
	/24-hour period			/7-day period			/90-day period			/365-day period		
	Avg.	STDEV	Range	Days	Avg.	STDEV	Days	Avg.	STDEV	Days	Avg.	STDEV
Area sampling:												
Fumigation chambers	88	n/a	n/a	6	75	n/a	63	62	n/a	150	24	n/a
Fumigation cage	54	n/a	n/a	6	46	n/a	63	38	n/a	150	15	n/a
Leak checkers-chambers 4-5	4	n/a	2&6	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Aeration-chambers 4-5	116	n/a	47&186	6	99	n/a	63	81	n/a	150	32	n/a
Clearing-chambers 4-5	46	n/a	26&66	6	39	n/a	63	32	n/a	150	13	n/a
Hopper areas	8	n/a	2&13	6	7	n/a	63	6	n/a	150	3	n/a
Stem picker	27	3	24-30	6	23	0	63	19	2	150	11	1
e) Fumigation of two non-certified chambers (walnut, shelled and in-shell):												
Cracking-workers	1141	269	933-1789	6	978	231	70	887	209	n/a	n/a	n/a
Sorting-workers	593	116	397-770	6	508	99	70	461	90	n/a	n/a	n/a
Fumigators	559	446	123-1123	6	479	382	70	316	252	185	129	103
Cleaning-fumigator	80	n/a	n/a	6	69	n/a	70	45	n/a	185	18	n/a
Cleaning-sort 1-3	889	185	723-1089	6	762	159	70	691	144	n/a	n/a	n/a
Bulk casing worker	856	n/a	n/a	6	734	n/a	70	666	n/a	n/a	n/a	n/a
In-shell-packer 1-2	972	n/a	933&1011	6	833	n/a	70	756	n/a	n/a	n/a	n/a
Hopper operator	778	n/a	n/a	6	667	n/a	70	605	n/a	n/a	n/a	n/a
Fumigator	225	n/a	n/a	6	193	n/a	70	127	n/a	185	52	n/a
Area sampling:												
Fumigatorium	75	n/a	n/a	6	64	n/a	70	42	n/a	185	17	n/a
Sorting area 1-2	323	n/a	117&529	6	277	n/a	70	251	n/a	n/a	n/a	n/a
Cracking area	1089	n/a	n/a	6	933	n/a	70	847	n/a	n/a	n/a	n/a
Vac. chamber area	1,789	n/a	n/a	6	1533	n/a	70	1391	n/a	n/a	n/a	n/a
Cleaning building fumigator	802	n/a	n/a	6	687	n/a	70	453	n/a	185	185	n/a
f) Sea van aeration (dried unpackaged prunes):												
Upwind of sea van	9	n/a	n/a	6	8	n/a	70	7	n/a	n/a	n/a	n/a
Downwind-centers1-3	18	13	8-32	6	15	11	70	14	10	n/a	n/a	n/a
Downwind-left1-3, right1-3	17	12	7-41	6	15	10	70	13	9	n/a	n/a	n/a

Table 11 (continued 5). Acute and non-acute exposures of persons in California to methyl bromide\*.

Number/ Type of application	Acute exposure (ppb)			Subacute exp. (ppb)			Subchronic exp. (ppb)			Chronic exp. (ppb)		
	/24-hour period			/7-day period			/90-day period			/365-day period		
	Avg.	STDEV	Range	Days	Avg.	STDEV	Days	Avg.	STDEV	Days	Avg.	STDEV
18. Fumigation of cherries for export (T.30, 5)												
Control room: start-up	171	147	3-366	5	122	105	n/a	n/a	n/a	n/a	n/a	n/a
Control room: left overnight	11	10	2-26	5	8	7	n/a	n/a	n/a	n/a	n/a	n/a
Fumigators, start-up	267	306	79-877	5	191	219	n/a	n/a	n/a	n/a	n/a	n/a
Fumigators, closing-up	327	n/a	219&435	5	234	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Fumigators, opening-up	58	46	1-124	5	41	33	n/a	n/a	n/a	n/a	n/a	n/a
Forklift drivers	11	14	4-47	5	8	10	n/a	n/a	n/a	n/a	n/a	n/a
Sorters	123	72	69-337	5	88	51	n/a	n/a	n/a	n/a	n/a	n/a
Compliance monitoring study: dump stations	18	7	9-27	5	13	5	n/a	n/a	n/a	n/a	n/a	n/a
19. Methyl bromide air monitoring studies at a walnut processing facility (T.31; 6)												
a) Worker exposure studies												
Bulk packaging	39	28	1-74	6	33	24	75	33	23	n/a	n/a	n/a
Cleaning plant	233	165	1-448	6	200	141	75	194	138	n/a	n/a	n/a
Dock 5	500	n/a	n/a	6	429	n/a	75	417	n/a	n/a	n/a	n/a
Fumigatorium	45	50	1-106	6	39	43	75	27	31	180	10	11
Packaging	62	n/a	44&80	6	53	n/a	75	52	n/a	n/a	n/a	n/a
Vacuum chamber	283	216	92-636	6	243	185	75	236	180	n/a	n/a	n/a
Sorting	39	17	14-70	6	33	15	75	33	14	n/a	n/a	n/a
Special cracking	62	56	1-170	6	53	48	75	52	47	n/a	n/a	n/a
b) Area samples												
Meats pool	71	53	12-126	2	20	15	n/a	n/a	n/a	n/a	n/a	n/a
Warehouse/warehouse isle	53	18	26-66	2	15	5	n/a	n/a	n/a	n/a	n/a	n/a
Sorting line	57	46	2-86	2	16	13	n/a	n/a	n/a	n/a	n/a	n/a
West alleyway	28	n/a	n/a	2	8	n/a	n/a	n/a	n/a	n/a	n/a	n/a
West cage door	20	n/a	n/a	2	6	n/a	n/a	n/a	n/a	n/a	n/a	n/a
East alleyway	6	n/a	n/a	2	2	n/a	n/a	n/a	n/a	n/a	n/a	n/a
East cage door	6	n/a	n/a	2	2	n/a	n/a	n/a	n/a	n/a	n/a	n/a
c) On-site ambient air monitoring												
Vicinity of chambers (10/28/93 and 11/19/93)	171	174	11-435	2	49	50	n/a	n/a	n/a	n/a	n/a	n/a
Chamber: Within 20' of the inj apparatus	4100	n/a	1400&6800	2	1171	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Fence and gate areas (12/16/93)	2	2	1-5	2	0.6	0.6	n/a	n/a	n/a	n/a	n/a	n/a
Chambers-Butler (12/20/93)	576	907	32-1933	2	165	259	n/a	n/a	n/a	n/a	n/a	n/a
Fence and gate areas-east & north (12/20/93)	2	1	2-5	2	0.6	0.3	n/a	n/a	n/a	n/a	n/a	n/a
Chambers-Polygon&Butler (12/20/93)	5	4	2-13	2	1	1	n/a	n/a	n/a	n/a	n/a	n/a
Fence and gates-south & west (12/20/93)	3	0.7	2-4	2	0.9	0.2	n/a	n/a	n/a	n/a	n/a	n/a

Table 11 (continued 6). Acute and non-acute exposures of persons in California to methyl bromide\*.

Number/ Type of application	Acute exposure (ppb)			Subacute exp. (ppb)			Subchronic exp. (ppb)			Chronic exp. (ppb)		
	/24-hour period			/7-day period			/90-day period			/365-day period		
	Avg.	STDEV	Range	Days	Avg.	STDEV	Days	Avg.	STDEV	Days	Avg.	STDEV
Chambers-Butler (3/11/94)	548	796	81-1467	2	157	227	n/a	n/a	n/a	n/a	n/a	n/a
Chambers-Butler (3/17/94)	17	18.5	2-47	2	5	5	n/a	n/a	n/a	n/a	n/a	n/a
Fence (3/17/94)	14	18.6	1-35	2	4	5	n/a	n/a	n/a	n/a	n/a	n/a
Lamp post (10/25-26/94)	5	n/a	3.8&6.3	2	1	n/a	n/a	n/a	n/a	n/a	n/a	n/a
North fence (10/25-26/94)	14	n/a	5.8&21.9	2	4	n/a	n/a	n/a	n/a	n/a	n/a	n/a
North gate (10/25-26/94)	6	n/a	3.6&7.9	2	2	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Pallets (10/25-25/94)	36	n/a	8.9&64	2	10	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Polygon fence (10/25-26/94)	13	n/a	3.7&27.6	2	4	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Polygon ramp (10/25-26/94)	60	n/a	47.2&72	2	17	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Rooftop (10/25-26/94)	7	n/a	1&13.2	2	2	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Scale house (10/25-26/94)	19	n/a	12.3&24.9	2	5	n/a	n/a	n/a	n/a	n/a	n/a	n/a
South center&west fences (10/25-26/94)	20	18	3.3-45.7	2	6	5	n/a	n/a	n/a	n/a	n/a	n/a
Storage area (10/25-26/94)	4	n/a	3.3&4.3	2	1	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Warehouse dock (12/25-26/94)	111	n/a	24.8&198	2	32	n/a	n/a	n/a	n/a	n/a	n/a	n/a
West fence (12/25-26/94)	10	n/a	8.6&12.2	2	3	n/a	n/a	n/a	n/a	n/a	n/a	n/a
d) Compliance monitoring:												
Sorting line in cleaning plant	318	28	287-343	6	273	24	75	265	23	n/a	n/a	n/a
Cello pack. of in-shell walnuts in main bldg.	355	26	326-375	6	304	22	75	296	22	n/a	n/a	n/a
Bulk pack. of in-shell walnuts in main bldg.	243	n/a	242&245	6	208	n/a	75	203	n/a	n/a	n/a	n/a
Truck dumping work station near dock 5:												
Foreman's desk top	369	n/a	n/a	6	316	n/a	75	308	n/a	180	182	n/a
Foreman's desk, phone box shelf top	28	n/a	n/a	6	24	n/a	75	23	n/a	180	14	n/a
Fence between chambers 2 and 3	479	n/a	n/a	2	137	n/a	n/a	n/a	n/a	n/a	n/a	n/a
20. Fumigation and aeration at a brewery facility (T.32; 7)												
a) Applicators												
Entry and reentry to open canisters/cylinders	28.9	n/a	n/a	2	8.3	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Area sample (door to buffer zone)	42	n/a	n/a	2	12	n/a	n/a	n/a	n/a	n/a	n/a	n/a
b) Aerators												
Aerators	25	24	24&25	2	7	7	n/a	n/a	n/a	n/a	n/a	n/a
Area sample (left of entrance door)	173	n/a	n/a	2	49	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Area sample (on applicator's truck)	100	n/a	n/a	2	29	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Table 11 (continued 7). Acute and non-acute exposures of persons in California to methyl bromide\*.

Number/ Type of application	Acute exposure (ppb)			Subacute exp. (ppb)			Subchronic exp. (ppb)			Chronic exp. (ppb)		
	/24-hour period			/7-day period			/90-day period			/365-day period		
	Avg.	STDEV	Range	Days	Avg.	STDEV	Days	Avg.	STDEV	Days	Avg.	STDEV
21. Outdoor and indoor MB air concentrations near fumigated houses (T.33; 8.a)												
Outdoor air - 20 feet from the fumi. house	522	n/a	38-2990	7	522	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Indoor air - rooms closest to the fum house	24	n/a	24-406	7	24	n/a	n/a	n/a	n/a	n/a	n/a	n/a
22. Downwind outdoor and indoor MB air concentrations during aeration of fumigated houses (T.34; 8.b)												
Outdoor air (adjusted)												
10 feet	296	n/a	24-1064	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
50 feet	80	n/a	24-208	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
100 feet	40	n/a	24-74	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Indoor air (adjusted)	60	n/a	24-168	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
23. Exposure of residents to MB in fumigated houses (T.37; 9)												
Southern CA (1.5 lbs MB/1,000 ft3)	210	n/a	n/a	7	172	146	n/a	n/a	n/a	n/a	n/a	n/a
Northern CA (3.0 lbs MB/1,000 ft3)	210	n/a	n/a	7	344	294	n/a	n/a	n/a	n/a	n/a	n/a
24. Exposure of residents to MB during commodity fumigation (T.38; 10)												
Low range of exposure days	210	n/a	n/a	3	90	n/a	30	70	n/a	150	86	n/a
High range of exposure days	210	n/a	n/a	6	180	n/a	75	175	n/a	185	106	n/a
25. Exposure of residents to MB from living near fumigated fields (Appendix D)												
Residents	210	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

**Notes:**

Most MB exposure studies, except for some modified soil injection fumigations, were conducted as bases to formulate proposed permit conditions. Listed below are studies that were conducted before DPR issued suggested MB permit conditions. Some conditions used in these studies were not in compliance with current suggested permit conditions, such as an application of MB was done inside a greenhouse, an aeration period was shorter than that recommended in permit conditions, chambers were not pressure tested, or chambers did not have standard stacks.

**Examples of MB fumigations that were not in compliance with current suggested permit conditions:**

Nursery potting soil fumigation, greenhouse soil fumigation, fumigation of grain products (chambers, vans, etc.), fumigation of dried fruit and tree nut products, fumigation at a walnut processing facility, fumigation at a brewery facility.

Even though those fumigation studies were not conducted in compliance with current suggested permit conditions, exposure data are shown in this document in order to indicate some problem areas for further improvement. It is desirable to obtain exposure data from studies that are conducted in compliance with current suggested permit conditions.

## EXPOSURE APPRAISAL

The exposure appraisal section contains information regarding the quality of exposure studies and the adequacy of submitted reports. This section also briefly describes uncertainty of default factors used in the calculation of exposure estimates. The section also provides some suggestions on how to obtain better exposure estimates for the MB risk assessment.

None of the submitted MB exposure studies met requirements set forth in Subdivision U (U.S. EPA, 1986b) regarding the number of replicates and locations of the studies, i.e., three locations and five replicates per location for each work task monitored. Many studies provided more than five replicates for each work task, but a majority of the field studies provide replicates ranging from one to three replicates. In most cases, these replicates were from one location. This occurred because DPR had requested expedited development of exposure monitoring data to revise the use permits. Additionally, many studies were not conducted in compliance with GLP standards indicated in 40 CFR 160 (U.S. EPA, 1998).

Reports of the studies were gradually submitted to the Department in the form of interim, internal, or draft reports. Only a few reports were finalized using a format similar to the PR Notice 86-5 (U.S. EPA, 1986c). Currently, many reports are still classified as interim or internal reports; finalizing these reports may not be accomplished by registrants in the foreseeable future. Nonetheless, these exposure data are shown in this exposure assessment document because registrants were asked by DPR to produce them and the studies were conducted in California.

A field fortification recovery study was not carried out in many of the exposure studies. This may be due to the fact that MB has a very high vapor pressure. It is extremely difficult to conduct a field fortification recovery study. Several laboratory recovery studies were performed and the monitoring data were adjusted for recoveries. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). Reports of several studies did not disclose application rates of MB. Authors could not make corrections regarding application rates and fortification recoveries. Thus, MB concentrations for some of those studies shown in this document could be lower than what they should be in actual work environment.

Frequency and duration of exposure are important factors employed in the calculation of non-acute exposure estimates. DPR realizes that registrants can provide data on frequency and duration of exposures because they have close contacts or business relationships with dealers, pest control operators or other users. That was why DPR issued several requests to registrants in November of 1997 for such data. The Department has received some information essential for the estimation of acute and non-acute exposures. DPR has made it clear in those letters that if registrants fail to provide requested data, the Department will derive default factors based upon available information and professional judgment. Authors of this document have conducted data searches, utilized survey results, as well as, consulted with knowledgeable persons on the use of MB. The default factors were established and used in the calculation of subacute and non-acute exposure estimates.

Many exposure data were obtained from studies employing short monitoring periods and then amortized to the 24-hour time-weighted average. These amortized exposure data could overestimate or underestimate the actual exposure.

Exposure estimates shown in this document are generally for specific work tasks and exposure scenarios. In other words, the exposure estimated for forklift drivers in a commodity fumigation or for applicators in a greenhouse fumigation was based on a specific time period used to perform those work tasks. It did not take into account the exposure to MB the remainder of the workday if those workers performed other duties. Also, the calculated maximum duration of a workday for acute exposure was based on sources other than current permit conditions. There is a good possibility that the acute exposure was underestimated because workers might work overtime during the peak use season. In contrast, we do not know the degrees of overestimation of exposure when a study was not conducted in compliance with current suggested permit conditions. It is desirable for the Department to obtain exposure data from studies that are conducted in compliance with the permit conditions.

Information on some of the variables mentioned in this section is intended to be qualitative in nature. It is difficult to judge quantitatively how these variables might affect MOE. For example, if the application rate was not mentioned, the rate could be at the maximum application rate. Hence, this variable would have no effect on exposure or MOE. Furthermore, we do not know if more data on frequency and duration of exposure would affect MOE and to what extent. We do not have sufficient background information to assign numbers to those variables. If we do so, it will cause some uncertainty concerning those assigned numbers.

## **ACKNOWLEDGMENT**

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## Appendix A

### Frequency and Duration of Exposure

Table 12. Frequency and duration of acute and non-acute exposures for workers and residents.

Number	Work task	Adjustment rate (lb. MB/A) (ref)	Hours/workday (ref.)		Workdays (ref.)		
			Acute	Subc-chronic*	/7 days	/90 days	/365 days
1.a	<i>Shallow shank-tarped soil fumigation (broadcast) (T.13-17)</i>						
	<i>Applicators (used Noble Plow shanks, 10-12")</i>	400 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Co-pilots	400 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Shovelmen: Employed by growers	400 (1)	5.8 (7)	n/a-n/a (6)	3 (8)	n/a (6)	n/a (6)
	Tarpaulin removers: Employed by private companies	400 (1)	6 (6)	6-n/a (6)	5 (8)	55 (8)	n/a (6)
	Tarpaulin removers: Employed by growers	400 (1)	2 (6)	n/a-n/a (6)	2 (8)	n/a (6)	n/a (6)
1.b	<i>Deep shank injection fumigation (broadcast) (T.18)</i>						
	Applicators (used improved shank, 20-24")	400 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Co-pilots: Employed by application rigs	400 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Cultipacker tractor drivers: Employed by growers	400 (1)	5.8 (7)	n/a-n/a (6)	6 (8)	n/a (6)	n/a (6)
1.c	<i>Deep shank injection fumigation (Traver, etc., CA) (T.19)</i>						
	Applicators (used forward curving inj. shank, cl. scraper, 24")	400 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Disc drivers: Employed by PCOs	400 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Cultipacker tractor drivers: Employed by growers	400 (1)	5.8 (7)	n/a-n/a (6)	6 (7)	n/a (6)	n/a (6)
	Supervisor: Employed by PCOs	400 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
1.d	<i>Deep shank injection fumigation (Helm, CA) (T.20)</i>						
	Applicators (used forward curving shank, 24")	400 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Cultipackers: Employed by growers	400 (1)	5.8 (7)	n/a-n/a (6)	6 (7)	n/a (6)	n/a (6)
1.e	<i>Shallow shank-tarped bed fumigation (T.21)</i>						
	Applicators (used modified shanks, 6-8")	250 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Co-pilots	250 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
1.f	<i>Tarped-bed fumigation: Mitigation of exposure (T.22)</i>						
	Applicators (used Kennco Combi Superbedder, 14")	250 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Co-pilots	250 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Drivers: Employed by PCOs	250 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Drip tape layers: Employed by growers	250 (1)	5.8 (7)	n/a-n/a (6)	3 (8)	n/a (6)	n/a (6)

PCO = Pest control operator; n/a = Not applicable; T. = Table.

Adjustment rate = An application rate that was used to adjust air concentrations from a study using a different application rate.

Non-acute exposures include subacute, subchronic and chronic exposures.

\* Exposure times as indicated were used, where applicable, for the calculation of daily subchronic and chronic exposures (Tables 13-31, 38).

Table 12 (cont. 1). Frequency and duration of acute and non-acute exposures for workers and residents.

Number	Work task	Adjustment rate (lb. MB/A) (ref)	Hours/workday (ref.)		Workdays (ref.)		
			Acute	Subc-chronic*	/7 days	/90 days	/365 days
1.g	<i>Shallow shank, tarped bed fumigation (T.23)</i>						
	Applicators (used sweptback shank, 8")	250 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Co-pilots	250 (1)	5.8 (7)	5.8-n/a (7)	6 (7)	40 (7)	n/a (7)
	Shovelmen: Employed by growers	250 (1)	5.8 (7)	n/a-n/a (6)	3 (8)	n/a (6)	n/a (6)
	Pipelayers: Employed by growers	250 (1)	5.8 (7)	n/a-n/a (6)	3 (8)	n/a (6)	n/a (6)
	Irrigation pipe tractor drivers: Employed by growers	250 (1)	5.8 (7)	n/a-n/a (6)	3 (8)	n/a (6)	n/a (6)
1.h	<i>Tarp removers (shallow shank, broadcast, HB, 10-12") (T.24)</i>						
	Cutters: Growers	400 (1)	2 (6)	n/a-n/a (6)	2 (8)	n/a (8)	n/a (6)
	Cutter: Employed by independent companies	400 (1)	6 (6)	6-n/a (6)	5 (8)	30 (8)	n/a (6)
	Pullers: Employed by growers	400 (1)	2 (6)	n/a-n/a (6)	2 (8)	n/a (8)	n/a (6)
	Puller: Employed by independent companies	400 (1)	6 (6)	6-n/a (6)	5 (8)	30 (8)	n/a (6)
1.i	<i>Tarp cutters and removers (T.25)</i>						
	Cutters (Fum. Shallow, broadcast, VHB, Noble Plow shank, 10")	400 (1)	2 (6)	n/a-n/a (6)	5 (8)	n/a (6)	n/a (6)
	Removers: Employed by growers	400 (1)	2 (6)	n/a-n/a (6)	5 (8)	n/a (6)	n/a (6)
	Cutters and removers: Employed by independent companies	400 (1)	6 (6)	6-n/a (6)	5 (8)	30 (8)	n/a (6)
2.a	<i>Nursery potting soil fumigation (T.26)</i>						
	Applicators (used perforated plastic hoses, 6-mil PE)	0.6/yd <sup>3</sup> (3)	1 (6)	n/a-n/a (6)	1 (6)	n/a (6)	n/a (6)
	Applicator assistants	0.6/yd <sup>3</sup> (3)	1 (6)	n/a-n/a (6)	1 (6)	n/a (6)	n/a (6)
	Tarp removers	0.6/yd <sup>3</sup> (3)	1 (6)	n/a-n/a (6)	1 (6)	n/a (6)	n/a (6)
	Tractor drivers	0.6/yd <sup>3</sup> (3)	1 (6)	n/a-n/a (6)	1 (6)	n/a (6)	n/a (6)
	Truck drivers	0.6/yd <sup>3</sup> (3)	1 (6)	n/a-n/a (6)	1 (6)	n/a (6)	n/a (6)
	Potters	0.6/yd <sup>3</sup> (3)	3 (6)	n/a-n/a (6)	1 (6)	n/a (6)	n/a (6)
2.b	<i>Greenhouse soil fumigation (T.27)</i>						
	Applicators (used perforated plastic hoses, 1 mil HDT)	450 (2)	2 (6)	n/a-n/a (6)	1 (6)	n/a (6)	n/a (6)
	Tarp venters	450 (2)	1 (6)	n/a-n/a (6)	1 (6)	n/a (6)	n/a (6)
	Tarp removers	450 (2)	1 (7)	n/a-n/a (6)	1 (6)	n/a (6)	n/a (6)
3	<i>Fumigation of grain products (chambers, vans, etc.) (T.28)</i>						
	Applicators (6 mil PE, if used)	6/1,000 ft <sup>3</sup> (4)	6 (6) <sup>c</sup>	6.5-5 (6)	5 (6)	45 (6)	180 (6)
	Aerators	6/1,000 ft <sup>3</sup> (4)	6 (6) <sup>c</sup>	6.5-5 (6)	5 (6)	45 (6)	180 (6)
	Forklift drivers	6/1,000 ft <sup>3</sup> (4)	1 (6)	0.5-0.5 (6)	5 (6)	45 (6)	180 (6)
	Rice processing workers (Warehouse)	6/1,000 ft <sup>3</sup> (4)	6 (8)	n/a-n/a (6)	5 (8)	n/a (6)	n/a (6)



Table 12 (cont. 2). Frequency and duration of acute and non-acute exposures for workers and residents.

Number	Work task	Adjustment rate (lb. MB/A) (ref)	Hours/workday (ref.)		Workdays (ref.)		
			Acute	Subc-chronic*	/7 days	/90 days	/365 days
4	<i>Fumigation of dried fruit &amp; tree nut products (T.29)</i>						
	<i>1. Sea van</i>						
	Fumigators	1.5/1,000 ft <sup>3</sup> (4)	1 (6)	n/a-n/a (6)	2 (6)	n/a (6)	n/a (6)
	Fumigator observers	1.5/1,000 ft <sup>3</sup> (4)	1 (6)	n/a-n/a (6)	2 (6)	n/a (6)	n/a (6)
	Aeration	1.5/1,000 ft <sup>3</sup> (4)	1 (8)	n/a-n/a (8)	2 (6)	n/a (8)	n/a (8)
	Area sampling (15-foot downwind)	1.5/1,000 ft <sup>3</sup> (4)	1 (8)	n/a-n/a (8)	2 (8)	n/a (8)	n/a (8)
	<i>2. Chamber (dried prunes)</i>						
	Forklift operators	1.5/1,000 ft <sup>3</sup> (4)	0.5 (7)	n/a-n/a (6)	3 (7)	n/a (7)	n/a (7)
	Fumigators	1.5/1,000 ft <sup>3</sup> (4)	0.5 (7)	n/a-n/a (6)	3 (7)	n/a (7)	n/a (7)
	1-m from door	1.5/1,000 ft <sup>3</sup> (4)	0.5 (7)	n/a-n/a (6)	3 (7)	n/a (7)	n/a (7)
	2 & 15 m from chamber	1.5/1,000 ft <sup>3</sup> (4)	0.5 (7)	n/a-n/a (6)	3 (7)	n/a (7)	n/a (7)
	Leak check, side seal	1.5/1,000 ft <sup>3</sup> (4)	0.5 (7)	n/a-n/a (6)	3 (7)	n/a (7)	n/a (7)
	<i>3. Big chamber fumigation (raisins)</i>						
	Primary fumigators	1.5/1,000 ft <sup>3</sup> (4)	3 (6) <sup>c</sup>	2.5-2.5 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Secondary fumigators	1.5/1,000 ft <sup>3</sup> (4)	3.5 (6) <sup>c</sup>	2.5-2.5 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Aerators	1.5/1,000 ft <sup>3</sup> (4)	3 (6) <sup>c</sup>	2.5-2.5 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Forklift drivers	1.5/1,000 ft <sup>3</sup> (4)	2.5 (6) <sup>c</sup>	2-2 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Cathall operators	1.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-8 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Hopper operators	1.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-8 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Capper dumpers	1.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-8 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Inspectors	1.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-8 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Moister checkers	1.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-8 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Stem pickers	1.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-8 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Packers	1.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-8 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Shed-green forklift	1.5/1,000 ft <sup>3</sup> (4)	2.5 (6) <sup>c</sup>	2-2 (6)	5 (6)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Shed-blue tractor	1.5/1,000 ft <sup>3</sup> (4)	2.5 (6) <sup>c</sup>	2-2 (6)	5 (7)	60 (6) <sup>a</sup>	20&170 <sup>b</sup> (6)
	Aeration-shed 604-606	1.5/1,000 ft <sup>3</sup> (4)	3 (8)	2.5-2.5 (8)	5 (8)	60 (8)	20&170 <sup>b</sup> (6)
	Capper area	1.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-8 (6)	5 (6)	60 (6)	20&170 <sup>b</sup> (6)
	Hopper area	1.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-8 (6)	5 (6)	60 (6)	20&170 <sup>b</sup> (6)
	Catchoff area	1.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-8 (6)	5 (6)	60 (6)	20&170 <sup>b</sup> (6)
	Side hopper area	1.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-8 (6)	5 (6)	60 (6)	20&170 <sup>b</sup> (6)
	Stem picker area	1.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-8 (6)	5 (6)	60 (6)	20&170 <sup>b</sup> (6)
	Filler area, E-line	1.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-8 (6)	5 (6)	60 (6)	20&170 <sup>b</sup> (6)
	<i>4. Chamber (raisins)</i>						
	Fumigators	1.5/1,000 ft <sup>3</sup> (4)	1.5 (6) <sup>c</sup>	1.5-1 (6)	6 (6)	63 (6)	150 (6)

Table 12 (cont. 3). Frequency and duration of acute and non-acute exposures for workers and residents.

Number	Work task	Adjustment rate (lb. MB/A) (ref)	Hours/workday (ref.)		Workdays (ref.)		
			Acute	Sub-chronic*	/7 days	/90 days	/365 days
	Aerators	1.5/1,000 ft <sup>3</sup> (4)	1.5 (6) <sup>c</sup>	1.5-1 (6)	6 (6)	63 (6)	150 (6)
	Forklift drivers	1.5/1,000 ft <sup>3</sup> (4)	1 (6)	1-0.4 (6)	6 (6)	63 (6)	150 (6)
	Hopper operators	1.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-8 (6)	6 (6)	63 (6)	150 (6)
	Stem picker	1.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-8 (6)	6 (6)	63 (6)	150 (6)
	Fumigation area, cage	1.5/1,000 ft <sup>3</sup> (4)	1.5 (8)	1.5-1 (8)	6 (8)	63 (8)	150 (6)
	Leak check	1.5/1,000 ft <sup>3</sup> (4)	0.5 (8)	n/a-n/a (8)	n/a (8)	n/a (8)	n/a (8)
	Aeration chambers	1.5/1,000 ft <sup>3</sup> (4)	1.5 (6) <sup>c</sup>	1.5-1 (6)	6 (6)	63 (6)	150 (6)
	Clearing chamber	1.5/1,000 ft <sup>3</sup> (4)	1.5 (8) <sup>c</sup>	1.5-1 (8)	6 (8)	63 (8)	150 (8)
	Hopper area	1.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-8 (8)	6 (8)	63 (8)	150 (8)
	<i>5. Fumigation of non-certified chambers (nuts)</i>						
	Fumigators	3.5/1,000 ft <sup>3</sup> (4)	5.5 (6)	4-2.5 (6)	6 (6)	70 (6)	185 (6)
	Cleaning fumigator	3.5/1,000 ft <sup>3</sup> (4)	5.5 (8)	4-2.5 (8)	6 (8)	70 (8)	185 (8)
	Cracking, sorting, cleaning, packing	3.5/1,000 ft <sup>3</sup> (4)	8 (6)	8-n/a (6)	6 (6)	70 (6)	n/a (6)
	Bulk casing worker	3.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-n/a (8)	6 (8)	70 (8)	n/a (8)
	Hopper operator	3.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-n/a (8)	6 (8)	70 (8)	n/a (8)
	Area sampling: Fumigatorium	3.5/1,000 ft <sup>3</sup> (4)	5.5 (8)	4-2.5 (8)	6 (8)	70 (8)	185 (8)
	Area sampling: Sorting, cracking,	3.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-n/a (8)	6 (8)	70 (8)	n/a (8)
	Vacuum chamber area	3.5/1,000 ft <sup>3</sup> (4)	8 (8)	8-n/a (8)	6 (8)	70 (8)	n/a (8)
	Cleaning building fumigator	3.5/1,000 ft <sup>3</sup> (4)	4 (8)	4-2.5 (8)	6 (8)	70 (8)	185 (8)
	<i>6. Sea van aeration</i>						
	Upwind and downwind areas	3.5/1,000 ft <sup>3</sup> (4)	0.5 (8)	0.5-n/a (8)	6 (8)	70 (8)	n/a (8)
5	<i>Fumigation of cherries for export (T.30)</i>						
	Control room: Start-up	5/1,000 ft <sup>3</sup> (4)	1 (6)	n/a-n/a (6)	5 (6)	n/a (6)	n/a (6)
	Control room: Left overnight	5/1,000 ft <sup>3</sup> (4)	1 (6)	n/a-n/a (6)	5 (6)	n/a (6)	n/a (6)
	Fumigators	5/1,000 ft <sup>3</sup> (4)	1 (6)	n/a-n/a (6)	5 (6)	n/a (6)	n/a (6)
	Closing-up, opening-up	5/1,000 ft <sup>3</sup> (4)	1 (6)	n/a-n/a (6)	5 (6)	n/a (6)	n/a (6)
	Forklift drivers	5/1,000 ft <sup>3</sup> (4)	0.75 (6)	n/a-n/a (6)	5 (6)	n/a (6)	n/a (6)
	Sorters	5/1,000 ft <sup>3</sup> (4)	8 (6)	n/a-n/a (6)	5 (6)	n/a (6)	n/a (6)
	Dump station	5/1,000 ft <sup>3</sup> (4)	8 (6)	n/a-n/a (6)	5 (6)	n/a (6)	n/a (6)
6	<i>Fumigation at a walnut processing facility (T.31)</i>	Study rate-not known					
	Meats pool, bulk packaging, cleaning plant, cracking	no adjustment	8 (6)	8-n/a (6)	6 (6)	75 (6)	n/a (6)
	Warehouse workers (storage area)	no adjustment	8 (6)	8-8 (6)	6 (6)	75 (6)	180 (6)
	Warehouse aisle	no adjustment	8 (6)	8-n/a (6)	6 (6)	75 (6)	n/a (6)

Table 12 (cont. 4). Frequency and duration of acute and non-acute exposures for workers and residents.

Number	Work task	Adjustment rate (lb. MB/A) (ref)	Hours/workday (ref.)		Workdays (ref.)		
			Acute	Subc-chronic*	/7 days	/90 days	/365 days
	Sorting line	no adjustment	8 (6)	8-n/a (6)	6 (6)	75 (6)	n/a (6)
	Fumigatorium	no adjustment	5.5 (6)	4-2.5 (6)	6 (6)	75 (6)	180 (6)
	Cleaning plant	no adjustment	8 (6)	8-n/a (6)	6 (6)	75 (6)	n/a (6)
	Vacuum chamber	no adjustment	8 (6)	8-n/a (6)	6 (6)	75 (6)	n/a (6)
	Non-work areas (vicinity of fumigation chambers, fence line, alleyway, lamp posts, etc.)	no adjustment	0.5 (8)	n/a-n/a (8)	2 (8)	n/a (8)	n/a (8)
	<i>Compliance monitoring study:</i>						
	Foreman's desk top	Study rate-not known	8	8-8 (8)	6 (8)	75 (8)	180 (8)
	Foreman's desk, phone box shelf	no adjustment	8	8-8 (8)	6 (8)	75 (8)	180 (8)
	Fence between chambers	no adjustment	0.5	n/a-n/a (8)	6 (8)	75 (8)	180 (8)
7	<i>Warehouse fumigation at a brewery facility (T.32)</i>	Study rate-not known					
	Applicators (structural PCOs)	no adjustment	1.1(study)	n/a-n/a (8)	2 (8)	n/a (8)	n/a (8)
	Aerators (structural PCOs)	no adjustment	0.6 (study)	n/a-n/a (8)	2 (8)	n/a (8)	n/a (8)
	Work areas (workers in fumigated building)	no adjustment	8 (6)	8-n/a (8)	3 (8)	n/a (8)	n/a (8)
8	<i>Houses (at the former Mather Air force Base) (T.33-34)</i>						
	<i>a) During fumigation</i>						
	Indoor air (neighboring house)	3/1,000 ft <sup>3</sup> (9)	24	n/a-n/a (8)	7 (8)	n/a-n/a (8)	n/a-n/a (8)
	Outdoor air	3/1,000 ft <sup>3</sup> (9)	24	n/a-n/a (8)	7 (8)	n/a-n/a (8)	n/a-n/a (8)
	<i>b) During aeration</i>						
	Indoor air (neighboring house)	3/1,000 ft <sup>3</sup> (9)	24	n/a-n/a (8)	n/a (8)	n/a-n/a (8)	n/a-n/a (8)
	Outdoor air	3/1,000 ft <sup>3</sup> (9)	24	n/a-n/a (8)	n/a (8)	n/a-n/a (8)	n/a-n/a (8)
9	<i>Exposure of residents to MB in fumigated houses (T.37)</i>						
	Southern California	1.5/1,000 ft <sup>3</sup> (9)	24	n/a-n/a (8)	7 (8)	n/a-n/a (8)	n/a-n/a (8)
	Northern California	3/1,000 ft <sup>3</sup> (9)	24	n/a-n/a (8)	7 (8)	n/a-n/a (8)	n/a-n/a (8)
10	<i>Exposure of residents to MB during commodity fumigation (T.38)</i>						
	Low range of exposure days	no adjustment	24	24-n/a (8)	3 (6)	30 (6)	150 (6)
	High range of exposure days	no adjustment	24	24-n/a (8)	6 (6)	75 (6)	185 (6)

References for those indicated under "Hours/workday" and "Workdays" in this table.

1. Methyl bromide proposed or suggested soil injection fumigation permit conditions (issued between 6/94 to 7/97).
2. Suggested permit conditions for methyl bromide soil fumigation within a greenhouse (issued between 9/94 to 9/96).
3. Suggested permit conditions for methyl bromide fumigation of tarped potting soil (issued between 12/95 to 9/96).
4. Based on MB product labels.
5. Based on Gibbons, 1994.
6. Based on Haskell, 1998a.
7. Based on Haskell, 1998b.

8. Assumed exposure times were based on Haskell (1998a, 1998b) or Gibbons (1994) for similarity in work practices. Only acute and subacute exposures were assumed for exposure in non-work areas, such as fence line, lamp post, alleyway.
9. Sansone, 1998.  
(study) = from the study conducted by Gibbons, 1994.

Notes:

- <sup>a</sup> average value from three large commodity fumigation facilities.
- <sup>b</sup> each average value represents three small chambers (30, 20, and 20 days/year) and three large chambers (90, 200, and 220 days/year) for commodity fumigation facilities. The higher value was used for the estimation of MB exposure in this document.
- <sup>c</sup> if a worker performs dual work tasks, e.g., as an applicator and an aerator, one-half of exposure of applicator and aerator were combined to represent the exposure of an applicator/aerator. The same principle was also used for other dual work tasks.

## **Appendix B**

### **Worker Exposure Studies**

#### Methyl bromide studies conducted in and after 1992

Daily acute, subchronic and chronic exposures for each of the following studies were calculated based upon appropriate MB air concentrations and daily duration of exposure for acute, subchronic and chronic exposures as shown in Appendix A. These exposure estimates and frequency of exposure (Appendix A) were used to calculate subacute, subchronic, and chronic exposures, which are shown in Table 11.

#### 1. Preplant soil injection fumigation (including aeration, tarp removal)

Worker exposure studies during preplant soil injection fumigation with MB were conducted in treated fields, nurseries or greenhouses. The soil was typically prepared and was ready for planting crops. The tarpaulin was either used or not used depending on methods of fumigation. Information regarding fumigation methods are provided below.

#### 1.a Shallow-shank tarp method for MB fumigation: Worker exposure (Siemer & Associates, 1992a)

Report No. SM924096A-D (Final report)

Study director: S.R. Siemer, Ph.D. (Siemer & Associates, Inc.)

Compliance with GLP standards (40 CFR Part 160): This study was not conducted in compliance with GLP.

#### Application information

Formulation: MB 99.5%, Tricon 67-33, Tricon 57-43, Tricon 80-20

Application rate: 214-398 Lbs a.i./A

Date of application: July 14, 1992 to August 6, 1992

Location (area treated, acres): Hayward (12), Wasco (78, 78, 18.76), Salinas (20, 20), Union City (10-13, 10-13), Wasco (78, 78), Watsonville (17-20, 17-20, 17-20, 9-10).

Crops to be planted: Strawberries, roses, gladiolus

Use of tarpaulin: Dow or Cadillac high barrier tarpaulin

#### Application method:

MB was injected into the soil using two types of application equipment. A tractor was equipped with a pair of Noble Plow shanks (horizontal V-shaped blades) which were used to inject MB at a depth of 10-12". The Noble Plows were mounted to the tool bar. The injection spacing was 12" between injection outlets, which were evenly spaced across the trailing edge of each Noble Plow blade. The effective swath width was 7 feet. Each end of the tool bar had a conventional vertical shank that was injecting MB into the soil. This tractor was also equipped with an overhead fan above the head of the applicator. The fan chamber was 17" in diameter by 21" in height and was attached to the canopy of the tractor directly over the seat of the applicator. The fan was approximately 11 feet above the ground. There was a pair of plastic air supply pipe ducts for co-pilot positioned to either side of applicator. In addition, there was an opening and closing shovel on the field side of the tool bar to open and close the soil over the leading edge of the plastic tarp.

The thickness of the plastic tarpaulin used to seal the MB in the soil was 1.0 mil (Dow HB, Cadillac HB or Armin). The end of the tarp was buried with soil at the beginning and ending of swath. The lapping edge of the tarp was continuously glued to the previously laid adjacent strip. The other side was covered with a continuous band of soil.

#### MB air monitoring study

Work activities (monitoring time, replicates):

1. Applicator (tractor driver of application rig) (5.08-7.38 hrs, n=8)
2. Co-pilot (applicator assistant) (5.35-7.37 hrs, n=7)
3. Shovelman (assist in turning rig around at the end of row and sealing of row end and start of next) (4.1-7.08 hrs, n=9)
4. Tarp removers (5-6 days post-fumigation; tarp was cut using an ATV equipped with a cutting wheel; exposure was monitored for supervisor, tarp cutter, roper, truck loader) (1.83-1.93 hrs, n=3)

Exposure monitoring equipment:

1. Sample collection tubes-400/200 mg petroleum charcoal (A and B tubes, SKC #226-38-02).
2. Personal air sampling pumps-SKC model #222-3 or 224-PCXR7. The flow rate was set at approximately 20 mL/min.
3. Air inlet of tube A was set at about 8 inches from the worker's mouth.
4. Sampling tubes were kept on dry ice during storage and transportation.

Recovery study: An average recovery was 69%.

#### Exposure assessment

Air concentrations of MB in submitted reports were pre-adjusted using an average recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). MB concentrations were adjusted for an application rate of 400 Lbs a.i./acre. One-half (10 ppb) of the MDL was used for any values reported as none detected. MB concentrations obtained from the use of conventional (vertical) shanks in soil fumigation were not used to estimate worker exposures because this soil injection method is not allowed under the current permit conditions. Results are shown in Tables 13-17. Acute and non-acute exposure estimates are shown in Table 11.

Table 13. Exposure of applicators to methyl bromide during shallow shank-tarped soil injection fumigation (1.a).

Test No.	Lbs MB /A	Hours monitored	MB conc. ppm, v/v	Adjusted MB conc. ppm, v/v*	24-hour TWA (ppb)		
					Noble Plow shanks **		
					Acute	Subchr.***	Chr.***
924096A-1	398	5.32	0.903	1.25	303	303	n/a
924096A-3	398	5.4	0.010	0.01	3	3	n/a
924096A-4	398	6.5	0.423	0.59	142	142	n/a
924096A-5	235	5.08	0.052	0.12	30	30	n/a
924096A-7	398	5.8	0.251	0.35	84	84	n/a
924096A-9	398	5.43	0.245	0.34	82	82	n/a
924096A-11	214	7.38	0.087	0.22	54	54	n/a
924096A-13	280	5.92	0.397	0.78	189	189	n/a
AVERAGE					111	111	n/a
STDEV					98	98	n/a

Lbs MB/A = Lbs a.i./A

\*adjusted by DPR for 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

One-half of the MDL (0.01 ppm) was used for non-detects.

\*\*with a fan operating over the applicator's head; a reduced number of conventional shanks; the system consisted of a pair of horizontal V-shaped blades (Noble Plow shanks); injection depth was 10-12"; had opening and closing shovels to open and close soil over the leading edge of the plastic tarpaulin.

\*\*\*subchr. (subchronic) and chr. (chronic) were used for the calculation of subchronic and chronic exposures (Table 11); hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

Table 14. Exposure of co-pilots to methyl bromide during shallow shank-tarped soil injection fumigation (1.a).

Test No.	Lbs MB /A	Hours monitored	MB conc. ppm, v/v	Adjusted MB conc. ppm, v/v*	24-hour TWA (ppb)		
					Noble Plow shanks**		
					Acute	Subchr.***	Chr.***
924096A-1	398	5.35	1.546	2.14	518	518	n/a
924096A-3	398	5.4	0.102	0.14	34	34	n/a
924096A-4	398	6.5	0.792	1.10	265	265	n/a
924096A-5	235	6.05	0.220	0.52	125	125	n/a
924096A-7	398	5.77	0.772	1.07	259	259	n/a
924096A-9	398	5.43	0.559	0.78	187	187	n/a
924096A-11	214	7.37	0.285	0.74	178	178	n/a
AVERAGE					224	224	n/a
STDEV					152	152	n/a

\*adjusted by DPR for 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

One-half of the MDL (0.01 ppm) was used for non-detects.

\*\*with a fan operating over the co-pilot's head.

\*\*\*subchr. (subchronic) and chr. (chronic) were used for the calculation of subchronic and chronic exposures (Table 11); hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

Table 15. Exposure of shovelmen to methyl bromide during shallow shank-tarped soil fumigation (1.a).

Test No.	Lbs MB /A	Hours monitored	MB conc. ppm, v/v	Adjusted MB conc. ppm, v/v*	24-hour TWA (ppb)		
					Noble Plow shanks		
					Acute	Subchr.**	Chr.**
924096A-1	398	5.47	0.459	0.64	154	n/a	n/a
924096A-1	398	5.3	0.490	0.68	164	n/a	n/a
924096A-4	398	5.77	0.337	0.47	113	n/a	n/a
924096A-4	398	5.83	0.201	0.28	67	n/a	n/a
924096A-5	235	5.6	0.184	0.43	104	n/a	n/a
924096A-7	398	4.1	0.366	0.51	123	n/a	n/a
924096A-9	398	5.02	1.536	2.13	515	n/a	n/a
924096A-11	373	7.08	0.146	0.22	52	n/a	n/a
924096A-13	280	4.53	0.252	0.50	120	n/a	n/a
924096A-13	280	4.47	0.122	0.24	58	n/a	n/a
AVERAGE					147	n/a	n/a
STDEV					135	n/a	n/a

\*adjusted by DPR for 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

One-half of the MDL (0.01 ppm) was used for non-detects.

\*\*subchr. (subchronic) and chr. (chronic) are used for the calculation of subchronic and chronic exposures (Table 11); hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

chronic exposures (Table 11); hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

Table 16. Exposure of tarpaulin removers employed by PCOs to methyl bromide during collection oftarp from shallow shank-tarped soil injection fumigation (1.a).

Test No.	Lbs MB /A	Hours monitored	MB conc. ppm, v/v	Adjusted MB conc. ppm, v/v*	24-hour TWA (ppb)		
					Conventional shanks		
					Acute	Subchr.**	Chr.**
924096A-1	398	1.93	2.006	2.78	696	696	n/a
924096A-1	398	1.87	2.921	4.05	1013	1013	n/a
924096A-1	398	1.83	0.010	0.01	3	3	n/a
924096A-1	398	1.8	2.321	3.22	805	805	n/a
924096A-1	398	0.63	4.785	6.64	1659	1659	n/a
AVERAGE					835	835	n/a
STDEV					596	596	n/a

\*adjusted by DPR for 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

One-half of the MDL (0.01 ppm) was used for non-detects.



Table 17. Exposure of tarpaulin removers employed by growers to methyl bromide during collection of tarp from shallow shank-tarped soil injection fumigation (1.a).

Test No.	Lbs a.i. /A	Hours monitored	MB conc. ppm, v/v	Adjusted MB conc. ppm, v/v*	24-hour TWA (ppb)		
					Conventional shanks		
					Acute	Subchr.**	Chr.**
924096A-1	398	1.93	2.006	2.78	232	n/a	n/a
924096A-1	398	1.87	2.921	4.05	338	n/a	n/a
924096A-1	398	1.83	0.010	0.01	1	n/a	n/a
924096A-1	398	1.8	2.321	3.22	268	n/a	n/a
924096A-1	398	0.63	4.785	6.64	553	n/a	n/a
AVERAGE					278	n/a	n/a
STDEV					199	n/a	n/a

\*adjusted by DPR for 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

#### 1.b Non-tarp deep injection for measurement of MB exposure to the applicator, applicator assistant and cultipacker tractor driver (Siemer & Associates, 1992b).

Report No. SM924096B (interim report)

Study Director: S. R. Siemer (Siemer & Associates, Inc.)

Compliance with GLP standards: There was no GLP compliance statement in the report, but it was mentioned in the protocol that the study would be conducted in compliance with GLP.

#### Application information

Formulation: MB 99.5%

Application rate: 398 Lbs a.i./A

Date of application: (1992): July 15 (Chowchilla), July 28 (Shafter), October 21 (Shafter)

Location (area treated, acres): Chowchilla (25), Shafter (15), Shafter (15.2)

Use of tarpaulin: No

Crop to be planted: Almond

Application method: An application tractor was equipped with mounted tool bar. Shank injectors were set 20-24" deep, spaced up to 66" apart with a wing welded to the shank to break up the chisel chimney. The application tractor was followed by a disc-cultipacker to compact seal the soil surface. The tractor was equipped with a fan over an applicator's head.

#### MB air monitoring study

Work tasks (monitoring time, replicates): Applicators (4.71-7.88 hrs, n=3), co-pilot (4.72, n=1), cultipacker tractor drivers (4.6-6.52, n=2).

Exposure monitoring equipment: Similar to those for shallow shank tarp fumigation.

Recovery study: An average recovery was 69%.

#### Exposure/data assessment

Air concentrations of MB in submitted reports were pre-adjusted using an average recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50%

(Biermann and Barry, 1999; Helliker, 1999). MB concentrations were adjusted for an application rate of 400 Lbs a.i./acre. One-half of the MDL (10 ppb) was used for any values reported as none detected. Results are shown in Table 18. Acute and non-acute exposure estimates are shown in Table 11.

Table 18. Exposure of applicators, applicator assistants and cultipacker tractor drivers to methyl bromide during deep shank injection (1.b).

Work task	Lbs MB /A	Monitoring time (hrs)	MB conc. ppm, v/v*	Adjusted MB conc. ppm, v/v**	24-hr TWA (ppb)		
					Acute	Subchronic***	Chronic***
Conventional deep shank injection (the tractor was equipped with a fan over an applicator's head)							
Applicator 1	398	4.72	0.377	0.52	126	126	n/a
Applicator 2	398	7.88	0.539	0.75	181	181	n/a
				Average	154	154	n/a
Co-pilot	398	4.72	0.146	0.20	49	49	n/a
Cultipacker 1	398	4.6	0.294	0.41	99	n/a	n/a
Improved deep shank injection (the tractor was equipped with a fan over an applicator's head; used scrapers and press wheels on an application rig and the disc and drag bar on the second tractor pulling a cultipacker)							
Applicator 3	398	7.25	0.170	0.24	57	57	n/a
Cultipacker 2	398	6.52	0.210	0.29	70	n/a	n/a

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).  
One-half of the MDL (0.01 ppm) was used for non-detects.

\*\*\* subchronic and chronic were used for the calculation of subchronic and chronic exposures (Table 11); hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

#### 1.c Exposure of workers to MB during a deep shank, non-tarp soil fumigation near Traver, Hanford, and Madera in California (Siemer & Associates, 1993a).

Report No.: SR934100.1A1 (April 16, 1993, interim report)

Study Director: S. R. Siemer (Siemer & Associates, Inc.)

Compliance with GLP standards: No detailed statement of GLP compliance

#### Application information

Formulation: 99% MB

Application rate: 396 Lbs a.i./A

Date of application: February 16, 1993

Location (area treated): Traver, Hanford, and Madera in California

Use of tarpaulin: No.

Crops to be planted: Not specified

Application method (Basic equipment): An application tractor equipped with three forward curved shanks with 2x width of shank thickness chisel points (60" spacing) to inject MB to a depth of approximately 24 inches. The fumigation tractor was equipped with closing scrapers behind each of the three shanks, but not equipped with an overhead fan above the applicator.

The application tractor was equipped with a Type 2 air conditioned enclosed cab. Specific equipment used at each location is as follows:

- near Traver - used basic equipment plus a second tractor with a disc that followed the application tractor.
- near Hanford - used basic equipment plus a second tractor pulling a cultipacker that followed the application tractor.
- near Madera - used basic equipment plus a second tractor pulling a cultipacker that followed the application tractor.

#### MB air monitoring study

Work tasks (monitoring time, replicates): Applicator (2.72-6.53 hrs, n=3), disc driver (2.95 hrs, n=1), supervisor (3.28 hrs, n=1), cultipacker driver (2.95-6.2 hrs, n=2)

Exposure monitoring study: The exposure of workers to MB was measured by collecting air samples from the workers' breathing zone using charcoal sampling tubes during work activities.

Recovery: The average recovery was 69%.

#### Exposure/data assessment

MB concentrations were adjusted for an application rate of 400 Lbs a.i./acre and a recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). One-half of the MDL (10 ppb) was used for any values indicated non-detects. Results are shown in Table 19. Acute and non-acute exposure estimates are shown in Table 11.

Table 19. Methyl bromide air concentrations near the workers' breathing zone and the estimation of worker exposure (non-tarp soil fumigation near Traver, Hanford and Madera in California (1.c).

Work task	Lbs MB /A	Monitoring time (hrs)	MB conc. ppm, v/v*	Adjusted MB conc. ppm, v/v**	24-hr TWA (ppb)		
					Acute	Subchr.***	Chr.***
Traver: Basic injection equipment plus a second tractor with a disc							
Applicator 1	396	2.72	0.26	0.36	88	88	n/a
Disc driver	396	2.95	1.52	2.12	512	512	n/a
Hanford and Madera: Basic injection equipment plus a second tractor pulling a cultipacker							
Applicator 2	396	3.4	0.491	0.68	165	165	n/a
Applicator 3	396	6.53	0.066	0.09	22	22	n/a
				Average	94	94	n/a
Supervisor	396	3.28	0.198	0.28	67	67	n/a
Cultipacker 1	396	2.95	0.173	0.24	58	n/a	n/a
Cultipacker 2	396	6.2	0.03	0.04	10	n/a	n/a
				Average	34	n/a	n/a

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

One-half of the MDL (0.10-0.15 ug/mL) was used for non-detects.

\*\*\* subchr. (subchronic) and chr. (chronic) were used for the calculation of subchronic and chronic exposures shown in Table 11; hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

1.d Deep shank, non-tarp fumigation: Mitigation of MB worker exposure (near Helm, California) (Siemer and Associates, 1993b).

Report No.: SM934104.1-2, SM934104.2-1 (interim)

Study Director: S. R. Siemer (Siemer & Associates, Inc.)

Compliance with GLP standards: Not in compliance with GLP standards

Application information

Formulation: 97.6% MB/2.4% chloropicrin

Application rate: 392 Lbs a.i./A

Date of application: March 8, 1993.

Location (area treated, acres): Near Helm, California (40)

Use of tarpaulin: No.

Crop to be planted: Grapes

Application method: An application tractor was equipped with four forward curved shanks, each having a chisel point 2x wider than the width of the shank and an injector port forward of the leading edge of the shank body, behind the chisel point. The shanks were spaced 40 inches apart. The application tractor was equipped with a Type 2 air conditioned enclosed cab. Injection depth was approximately 27 inches. The shanks were each equipped with closing scrapers and followed by a gauge roller and a rolling cultipacker. During the fumigation, shank slices were covered with soil from the use of closing scrapers. The soil was then compressed by the gauge roller. The soil in shank slices was further compressed by a cultipacker which followed the application tractor within 5 minutes. In this improved deep soil injection fumigation method, a fan overhead of the applicator was not used.

MB air monitoring study

Work tasks (monitoring time, replicates): Applicator (9.18 hrs, n=1, cultipacker driver (8.38 hrs, n=1)

Exposure monitoring study: The exposure of workers to MB was measured by collecting air samples from the workers' breathing zone (approximately 8 inches from the mouth) using charcoal sampling tubes (400/200 mg charcoal) during work activities.

Recovery: The average recovery was 69%.

Exposure/data assessment

Air concentrations of MB in submitted reports were pre-adjusted using a recovery of 69%.

However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). MB concentrations were adjusted for an application rate of 400 Lbs a.i./acre. Results are shown in Table 20. Acute and non-acute exposure estimates are shown in Table 11.

Table 20. Methyl bromide air concentrations near the workers' breathing zone and the estimation of worker exposure (deep shank non-tarp soil fumigation near Helm, California) (1.d).

Work task	Lbs MB /A	Monitoring time (hrs)	MB conc. ppm, v/v*	Adjusted MB conc. ppm, v/v**	24-hr TWA (ppb)		
					Acute	Subchr.***	Chr.***
Applicator	392	9.18	0.02	0.03	7	7	n/a
Cultipacker	392	8.38	0.02	0.03	7	n/a	n/a

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

One-half of the MDL (0.10-0.15 ug/mL) was used for non-detects.

\*\*\* subchr. (subchronic) and chr. (chronic) were used for the calculation of subchronic and chronic exposures shown in Table 11; hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

#### 1.e Shallow shank, tarped-bed soil fumigation: Worker exposure (Siemer & Associates, 1992c).

Report No. (status): SM924096 C, M (Interim report)

Study Director: S. R. Siemer & Associates, Inc.

Compliance with GLP standards: There was no information on GLP compliance.

#### Application information

Formulation: 75% MB

Application rate: 187.5 Lbs a.i./A

Date of application: 10/92 and 11/17-18/92

Location (area treated, acres): Santa Maria

Use of tarpaulin: Yes

Crop to be planted: Strawberries

#### Application methods:

An application rig was equipped with three 6- to 8-inch shanks, closing rollers, and tarp-laying equipment plus scrapers (closing shoes) mounted between the trailing edge of each shank and the closing roller. The scrapers were mounted to be rigid laterally and pivot vertically; their leading edge was forward of the trailing edge of each shank. The scrapers kept soil heaped on the base of each shank and traveled just under the soil surface so that soil and trash flowed over them. Soil injection was 6-8 inches below bed top.

#### MB air monitoring study

Work tasks (monitoring time, replicates): Applicator (6.07-7.83 hrs, n=6), co-pilot (6.05-7.7 hrs, n=8), shovelman (7.1 hrs, n=2).

Exposure monitoring equipment: The exposure of workers to MB was measured by collecting air samples from the workers' breathing zone using charcoal sampling tubes (400/200 mg charcoal) during work activities.

Recovery study: An average recovery was 69%.

### Exposure assessment

Air concentrations of MB in submitted study reports were adjusted using a recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). MB concentrations were further adjusted by DPR for an application rate of 250 Lbs a.i./acre. Results are shown in Table 21. Acute and non-acute exposure estimates are shown in Table 11.

Table 21. Exposure of workers to methyl bromide during fumigation using conventional and modified injection shanks (1.e).

Work task	Lbs MB /A	Monitoring time (hrs)	MB conc. ppm, v/v*	Adjusted MB conc. ppm, v/v**	Adjusted MB conc. (ppb)		
					Mean	SD***	95th
Conventional injection shanks plus the raised co-pilot platform and an injection depth of 8"							
Applicator	187.5	7.33	0.18	0.33	330	330	872.85
Co-pilot	187.5	7.3	0.25	0.46	Range = 400-460		
Co-pilot	187.5	7.25	0.22	0.40			
Conventional injection shanks plus closing shoes							
Applicator	187.5	6.07	0.10	0.18	180	180	476.1
Co-pilot**	187.5	6.22	0.47	0.86	Range = 520-860		
Co-pilot**	187.5	6.05	0.28	0.52			

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for an application rate of 250 lbs MB/A (soil injection fumigation permit conditions, 12/95) and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

\*\*\* If there is one data point, SD was assumed to be equalled to that data point for the purpose of calculating the 95th percentile

(TCXL/MB/Dennis21-25)

### 1.f Tarped-bed fumigation: Mitigation of MB worker exposure (Siemer & Associates, 1993c)

Report No. (status): SM934104.1M (interim report)

Study Director: S. R. Siemer (Siemer & Associates, Inc.)

Compliance with GLP standards: There was no information on GLP compliance.

#### Application information

Formulation: 75% MB/25% chloropicrin (Tri-Con 75/25)

Application rate: 262.5 Lbs a.i./A

Date of application: February 15, 1993

Location (area treated, acres): Arvin, Kern County, CA (≅ 20 acres)

Use of tarpaulin: 1.5 mil black mulch film

Crop to be planted: Peppers

Application method: MB was applied by a two-stage method. One tractor, Kennco Combi Superbedder, was equipped with swept back shanks spaced approximately 10" apart. This Superbedder formed three beds (height-10," width-36") and injected MB to finished beds

from outlets at the end of each shank at a depth of 10-14". The shanks were positioned so that they would extend between the bed puller blades, just ahead of the bed shaper, with soil covering them to a depth of 18 to 24" during bed formation. The finished bed injection depth was approximately 12-14". Drip tape was laid from the fumigation tractor. The 6 foot wide plastic tarp was carried on a bar on the second tractor. The plastic tarp was unrolled and covered the beds. Press wheels held the tarp in place on the sides of the beds while shovels threw soil over the edge of the plastic.

#### MB air monitoring study

Work tasks (monitoring time, replicates): a) fumigation tractor-driver (7.77 hrs, n=1), applicator (7.72 hrs, n=1), tape layer (7.17 hrs, n=1); b) tarp laying tractor-driver (7.73 hrs, n=1), co-pilot (7.5 hrs, n=2)

Exposure monitoring equipment: The exposure of workers to MB was measured by collecting air samples from the workers' breathing zone using charcoal sampling tubes (400/200 mg charcoal) during work activities.

Recovery: A recovery of 88% was obtained by fortifying control samples with injecting standard.

#### Exposure assessment

Air concentrations of MB in submitted study reports were adjusted using a recovery of 88%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). MB concentrations were further adjusted by DPR for an application rate of 250 Lbs a.i./acre. Results are shown in Table 22. Acute and non-acute exposure estimates are shown in Table 11.

Table 22. Exposure of workers to methyl bromide during application using exposure mitigation method (1.f).

Work task	Lbs MB /A	Monitoring time (hrs)	MB conc.* ppm, v/v	Adjusted MB conc.** ppm, v/v	Adjusted MB conc. (ppb)		
					Mean	SD***	95th
The tractor was equipped for methyl bromide fumigation							
Driver	262.5	7.77	0.07	0.12	120	120	317.4
Applicator	262.5	7.72	0.11	0.18	180	180	476.1
Drip tape layer	262.5	7.17	0.16	0.27	270	270	714.15
The tractor was equipped for laying tarp							
Driver	262.5	7.73	0.01	0.02	20	20	52.9
Co-pilot 1	262.5	7.5	0.16	0.27	Range = 20-270		
Co-pilot 2	262.5	7.5	0.01	0.02			

\*adjusted by the study director for an a recovery of 88%. One-half of the MDL (10 ppb) was used for non-detects.

\*\* adjusted by DPR for an application rate of 250 lbs MB/A (soil injection fumigation permit conditions, 12/95) and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

\*\*\* If there is one data point, SD was assumed to be equalled to that data point for the purpose of calculating the 95th percentile.

(TCXL/MB/Dennis21-25)

1.g Tarped-bed fumigation for measurement of MB exposure to the applicator, applicator assistant, shovelman, irrigation pipelayers and pipe drive positions (Siemer & Associates, 1994)

Report No. (status): SM934110 (Interim report)

Study Director: S. R. Siemer (Siemer & Associates, Inc.)

Compliance with GLP standards: This study was conducted in compliance with GLP standards (40 CFR Part 160) with some exceptions. A signed copy of the QA statement was attached to the submitted report.

Application information

Formulation: 98% MB

Application rate: 287 Lbs a.i./treated acre

Date of application: July 13, 1993

Location (area treated, acres): Santa Maria, CA, 9 acres

Use of tarpaulin: 1.75 mil tarp

Crops to be planted: Strawberries

Application method: The soil was fumigated by using a modified method of injection with swept-back shanks and a closing device for sealing off the shank slice. Three sweptback-style shanks were spaced approximately 10 inches apart. MB was injected through a series of hoses, valves and tubing to an outlet at the end of each shank. The shanks were positioned so that the injection port was extended backwards underneath the compaction roller. A closing device was situated to close the shank slice between the shank and the press roller. The injection depth was 6-8 inches. The closing device moved soil over the shank slice and the compaction roller pressed the soil into the shank slice ahead of the plastic tarpaulin simultaneously laid over the top and side of the bed. The preformed beds measured 12-14 inches high and approximately 41 inches wide. The application tractor was not equipped with an overhead fan. The irrigation and cultural practices were not described in the report because of the lack of supporting documentation.

MB air monitoring study

Work tasks (monitoring time, replicates): Applicator (10.33 hrs, n=1), applicator assistant (7.98 and 8 hrs, n=2), shovelmen (9.32 and 7.83 hrs, n=2), irrigation pipelayers (8.82, 9.32, 10.17 hrs, n=3), and pipe drive positions (each 10.58 hrs, n=3)

Exposure monitoring equipment: Air samples were collected by using a sampling train consisted of two charcoal tubes containing 400 and 200 mg of charcoal and a personal sampling pump. Air intake ends of the sampling tube was positioned approximately 8 inches from the worker's mouth. The pump flow rate was approximately 20 mL/min.

Analysis (recovery): Each sample was adjusted for "Laboratory correction."

Exposure/data assessment

Air concentrations of MB in submitted study reports were adjusted using a recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). MB concentrations were further adjusted by DPR for an application rate of 250 Lbs a.i./acre. Results are shown in Table 23. Acute and non-acute exposure estimates are shown in Table 11.



Table 23. Exposure of handlers to methyl bromide during shallow shank, tarped-bed fumigation (1.g).

Work task	Lbs MB /A	Monitoring time (hrs)	MB conc. ppm, v/v*	Adjusted MB conc.** ppm, v/v	Adjusted MB conc. (ppb)		
					Mean	SD***	95th
Applicator	287	10.33	0.012	0.01	10	10	26.45
Co-pilot A	287	7.98	0.108	0.13	Range 130-130		
Co-pilot B	287	8.00	0.109	0.13			
Shovelman A	287	9.32	0.002	0.002	Range = 2-2		
Shovelman B	287	7.83	0.002	0.002			
Pipelayer A	287	8.82	0.008	0.01	13.62	4.22	20.57
Pipelayer B	287	9.32	0.015	0.02			
Pipelayer C	287	10.17	0.011	0.01			
Irr. pipe trac. driver	287	10.58	3.161	3.80	1702.16	1973.79	4949.04
Irr. pipe trac. driver	287	10.58	2.473	2.97			
Irr. pipe trac. driver	287	10.58	0.026	0.03			
Irr. pipe trac. driver	287	10.58	0.004	0.005			

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for an application rate of 250 lbs MB/A (soil injection fumigation permit conditions, 12/95) and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

\*\*\* If there is one data point, SD was assumed to be equalled to that data point for the purpose of calculating the 95th percentile

(TCXL/MB/Dennis21-25)

On July 7, 1998, the Department issued a memo to county agricultural commissioners informing them that the installation of sprinkler irrigation pipe during soil fumigation is not recognized in the current suggested soil permit conditions for MB (Sanders and Andrews, 1998). Some growers would like to continue the practice because the water from the sprinkler system may help keep the tarpaulin in place in windy conditions. However, the memo mentioned that preliminary data collected early in the permit condition development showed this procedure could result in serious over exposure to workers involved in pipe installation.

#### 1.h MB exposure to the tarpaulin cutter and remover positions from tarped-shallow broadcast fumigation (TriCal, 1993a).

Report No. (status): TC211 (interim report)

Study Director: TriCal, Inc.

Compliance with GLP standards: A signed copy of GLP statement was not available in the report.

#### Application information

Formulation: MB 99.5% (Burrell and Corcoran), 80% (Watsonville )

Application rate (Lbs a.i./A): 298.5 (Burrell), 398 (Corcoran), and 280 (Watsonville)

Date of application: April 4, 12, and 28, 1993

Location (area treated, acres): Burrell (10.74 acres), Corcoran (10.48 acres), Watsonville (8.07 acres)

Use of tarpaulin: Dow HB or Cadillac HB

Crops to be planted: Grapes, flowers, turf

Application method: The broadcast fumigation of MB was made with Noble Plow shanks at the depth of 10-12". The tarpaulin was left in place for a minimum of five days after the completion of fumigation. After the five-day waiting period, each tarp panel was cut by a four wheeler using a cutting coulter. The aeration period for MB after the tarp cutting was complete was one day. At the end of the aeration period, tarp removal proceeded by windrowing the plastic panels and then pulling these panels into a truck for disposal.

#### MB air monitoring study

Work tasks (monitoring time, replicates): Tarpaulin cutters (driver) (0.52-1.23 hrs, n=3), tarpaulin pullers or removers (e.g. tractor drivers, end rollers) (1.09-2.1 hrs, n=12).

Exposure monitoring equipment: Air samples were collected by using a sampling train consisting of two charcoal tubes containing 400 and 200 mg of charcoal and a personal sampling pump. Samples were taken from the breathing zones of the tarpaulin cutter and puller positions.

Recovery: The average recovery was 69%.

#### Exposure/data assessment

Air concentrations of MB in submitted study reports were adjusted using the average recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). MB concentrations were further adjusted by DPR for an application rate of 400 Lbs a.i./acre. Results are shown in Table 24. Acute and non-acute exposure estimates are shown in Table 11.

Table 24. Exposure of tarp cutters and removers to methyl bromide (1.h).

Work task	Lbs MB /A	Monitoring time (hrs)	MB conc. ppm, v/v*	Adjusted MB conc.** ppm, v/v	Adjusted MB conc. (ppb)		
					Mean	SD***	95th
(By PCOs)							
Cutter 2	298.5	0.52	0.01	0.02	326.22	537.00	1209.58
Cutter 1	398	1.1	0.01	0.01			
Cutter 1	280	1.23	0.48	0.95			
(By growers)							
Assume the same acute MB concentrations as that for PCOs					326.22	537.00	1209.58
(By PCOs)							
Puller 1(a)	298.5	2	0.01	0.02	131.03	366.71	734.26
Puller 2(b)	298.5	2	0.01	0.02			
Puller 3(b)	298.5	2	0.7	1.29			
Puller 1	398	2.1	0.04	0.06			
Puller 2	398	2.08	0.01	0.01			
Puller 3	398	1.6	0.01	0.01			
Puller 1	280	1.17	0.01	0.02			
Puller 2	280	1.21	0.03	0.06			
Puller 3	280	1.2	0.01	0.02			
Puller 4	280	1.12	0.01	0.02			
Puller 5	280	1.09	0.01	0.02			
Puller 6	280	1.1	0.01	0.02			
(By growers)							
Assume the same acute MB concentrations as that for PCOs					131.03	366.71	734.26

(a) end roller (b) tractor driver

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for an application rate of 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999). One half of the MDL (0.01 ppm) was used for non-detects.

\*\*\* If there is one data point, SD was assumed to be equalled to that data point for the purpose of calculating the 95th percentile

(TCXL/MB/Dennis21-25)

### 1.i Worker exposure to MB during tarp cutting and removal (TriCal, 1993b)

Report No. (status): TC233.3 (interim)

Study Director: Kirk Fowler (TriCal, Inc.)

Compliance with GLP standards: This study was not conducted in compliance with GLP standards (40 CFR Part 160).

#### Application information

Formulation: 99.5% MB

Application rate: 390.2 Lbs a.i./A

Date of application: October 19, 1993

Location (area treated, acres): Gonzales (Monterey) (7.09)

Use of tarpaulin: 1.0 mil high barrier test film

Crops to be planted: Head lettuce

Application method: MB was injected into the soil at a depth of 10 inches using Noble Plow shanks. The fumigated area was thereafter covered with high barrier test film. The tarpaulin was left in place for at least five days after the complete of the application. After the five-day waiting period, each panel of the tarp was cut along the tape by an ATV equipped with a cutting wheel. After cutting and a 24-hour waiting period had elapsed, the tarpaulin was removed by workers.

#### MB air monitoring study

Work tasks (monitoring time, replicates): Tarp cutter (0.36 hrs, n=1), Tarp remover (Tractor driver, basketman, end puller) (1.20-1.23 hrs, n=3)

Exposure monitoring equipment: MB levels were measured by collecting air samples from the workers' breathing zone using charcoal tubes (400/200 mg charcoal) for the duration of the work period.

Recovery: The average recovery was 69%.

#### Exposure/data assessment

Air concentrations of MB in submitted study reports were adjusted using the average recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). MB concentrations were further adjusted by DPR for an application rate of 400 Lbs a.i./acre. Results are shown in Table 25. Acute and non-acute exposure estimates are shown in Table 11.

Table 25. Exposure of tarp cutters and removers to methyl bromide following the use of high barrier tarpaulin (1.i).

Work task	Lbs MB /A	Monitoring time (hrs)	MB conc. ppm, v/v*	Adjusted MB conc.** ppm, v/v	Adjusted MB conc. (ppb)		
					Mean	SD***	95th
Tarp cutter (by PCOs)	390.2	0.36	0.22	0.31	310	310	819.95
Tarp remover (by PCOs)							
Tarp remover 1 (Tractor driver)	390.2	1.2	0.97	1.37	1370	1370	3623.65
Tarp remover 2 (Basketman)	390.2	1.21	0.92	1.30	1300	1300	3438.5
Tarp remover 3 (End puller)	390.2	1.23	0.02	0.03	30	30	79.35
Tarp cutter (by growers)							
Assume the same acute MB concentrations as that for PCOs					310	310	819.95
Tarp remover (by PCOs)							
Assume the same acute MB concentrations as that for PCOs							
Tarp remover 1 (Tractor driver)					1370	1370	3623.65
Tarp remover 2 (Basketman)					1300	1300	3438.5
Tarp remover 3 (End puller)					30	30	79.35

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for an application rate of 400 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999). One half of the MDL (0.01 ppm) was used for non-detects.

\*\*\* If there is one data point, SD was assumed to be equalled to that data point for the purpose of calculating the 95th percentile

(TCXL/MB/Dennis21-25)

## 2. Soil fumigation in nurseries and greenhouses

### 2.a Worker exposure assessment from potting soil fumigation (Siemer & Associates, 1992d)

Report No. (status): SM924099B1 (interim)

Study Director (company): S. R. Siemer (Siemer and Associates, Inc.)

Compliance with GLP standards: There was no information on compliance with GLP standards (40 CFR Part 160).

#### Application information

Formulation: 99.5% MB

Application rate: 0.5 Lbs a.i./yd<sup>3</sup>

Date of application: October 1992

Location (area treated, acres): Visalia (Tulare County) (6,000 yd<sup>3</sup>)

Use of tarpaulin: 6 mil polyethylene

Crops to be planted: Ornamentals

Application method: MB was injected through two perforated plastic hoses (3/16" diameter) spaced 10 feet apart on top of the soil, stretching the length of the tarpaulin-covered potting soil pile. The tarp around the perimeter of the soil pile was sealed with "sand snakes." The typical potting soil pile was 27 feet wide x 100 feet long x 4 feet deep. The tarp was left in place for two days after the completion of the application. Two days following fumigation, the tarp was removed by hand. The soil pile was left to vent for an additional two days. A

skip loader placed approximately 2 ½ loads into a dump truck which then transported to the potting area which was approximately one half mile away. An enclosed cab front end loading tractor heaped the soil into a new pile. This same tractor was also used to fill the canning equipment hopper during the canning operation. The canning operation consisted of the soil being screw-conveyed to a revolving bin, which emptied soil into pots that were conveyed to the canning area. Two canners filled pots with soil. Other workers involved in the canning operation were one pot stager and two stackers. Only canners were monitored for exposure because they had the most immediate contact with the fumigated soil.

#### Air monitoring study

Work tasks (monitoring time, replicates): Applicator (0.33-0.68 hrs, n=2), applicator assistant (0.28-0.68 hrs, n=2), tarpaulin remover (0.58-1.22 hrs, n=4), tractor driver (2.02-2.4 hrs, n=2), dump truck driver (1.98-2.4 hrs, n=3), and potter or canner (2.78-3.33 hrs, n=4).

Exposure monitoring equipment: The exposure was measured by collecting air samples from the workers' breathing zone using charcoal sampling tubes (400/200 mg charcoal) connected to a personal air sampling pump.

Recovery: The average recovery was 69%.

#### Exposure/data assessment

Air concentrations of MB in submitted study reports were adjusted using the average recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). MB concentrations were further adjusted by DPR for an application rate of 0.6 Lbs MB/yd<sup>3</sup>. Results are shown in Table 26. Acute and non-acute exposure estimates are shown in Table 11.

Table 26. Worker exposure assessment from potting soil fumigation (2.a).

Replicate	Lbs MB /yd3	Monitoring time (hrs)	MB conc. ppm, v/v*	Adjusted MB conc.** ppm, v/v	24-hr TWA (ppb)		
					Acute	Subchr.***	Chr.***
Applicator 1	0.5	0.33	0.37	0.61	26	n/a	n/a
Applicator 2	0.5	0.68	0.24	0.40	17	n/a	n/a
				Average	21	n/a	n/a
Applicator assistant 1	0.5	0.28	0.45	0.75	31	n/a	n/a
Applicator assistant 2	0.5	0.68	0.02	0.03	1	n/a	n/a
				Average	16	n/a	n/a
Tarp remover 1	0.5	0.58	1.93	3.20	133	n/a	n/a
Tarp remover 2	0.5	0.6	1.28	2.12	88	n/a	n/a
Tarp remover 3	0.5	1.22	0.63	1.04	43	n/a	n/a
Tarp remover 4	0.5	1.22	1.59	2.63	110	n/a	n/a
				Average	94	n/a	n/a
				STDEV	38	n/a	n/a
Tractor driver 1	0.5	2.4	0.45	0.75	31	n/a	n/a
Tractor driver 2	0.5	2.02	0.01	0.02	1	n/a	n/a
				Average	16	n/a	n/a
Truck driver 1	0.5	2.4	0.01	0.02	1	n/a	n/a
Truck driver 2	0.5	2.02	0.01	0.02	1	n/a	n/a
Truck driver 3	0.5	1.98	0.11	0.18	8	n/a	n/a
				Average	3	n/a	n/a
				STDEV	4	n/a	n/a
Potter 1	0.5	3.33	0.01	0.02	2	n/a	n/a
Potter 2	0.5	3.3	0.46	0.76	95	n/a	n/a
Potter 3	0.5	2.8	0.03	0.05	6	n/a	n/a
Potter 4	0.5	2.78	0.12	0.20	25	n/a	n/a
				Average	32	n/a	n/a
				STDEV	43	n/a	n/a

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for an application rate of 0.6 lbs MB/yd3 and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

\*\*\* subchr. (subchronic) and chr. (chronic) were used for the calculation of subchronic and chronic exposures shown in Table 11; hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

## 2.b Exposure of workers to MB during soil fumigation in greenhouses (Siemer & Associates, 1992e)

Report No. (status): SM924099A1 (interim)

Study Director (company): S. R. Siemer (Siemer and Associates, Inc.)

Compliance with GLP standards: There was no information to determine whether the study was conducted in compliance with GLP standards

#### Application information

Formulation: 99.5% MB

Application rate: 447.75 Lbs a.i./A

Date of application: August and September, 1992

Location (area treated, acres): Oxnard, Ventura County (approximately 3/4 acres)

Use of tarpaulin: One mil high density tarpaulin

Application method: Each plot of soil in a greenhouse to be treated with MB measured 20 feet wide by 150 feet in length. The applicator brought the fumigation trailer, which was used for heating the gas, to the east opening in the building. After all workers had cleared the area, the gas tank was connected to the heater coils that were heated by a propane burner. From the heater coils another hose was connected to the main PVC plastic pipe feeder. Hot MB was released through the plastic pipe manifold to which were attached a series of perforated plastic hoses. These hoses ran along the surface of the soil under preplaced tarpaulin. Current permit conditions require applicators to introduce the fumigant from outside the greenhouse. In this study, the fumigant was not introduced from outside the greenhouse.

Three days after the completion of fumigation, the tarp was cut open by hand using knives with elongated handles. The strips of the tarp were pulled apart and the greenhouse was allowed to vent for 48 hours. At the end of the venting period, the tarp was pulled and disposed.

#### Air monitoring study

Work tasks (monitoring time, replicates): Applicator (1.17-1.73 hrs, n=2), tarpaulin venter (0.35-0.65 hrs, n=4), tarp remover (1.03-1.37 hrs, n=4).

Exposure monitoring equipment: The exposure was measured by collecting air samples from the workers' breathing zone using charcoal sampling tubes (400/200 mg charcoal) connected to a personal air sampling pump. The flow rate was approximately 20 mL/min.

Recovery: The average recovery was 69%.

#### Exposure/data assessment

Air concentrations of MB in submitted study reports were adjusted using the average recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). MB concentrations were further adjusted by DPR for an application rate of 450 Lbs a.i./acre. Results are shown in Table 27. Acute and non-acute exposure estimates are shown in Table 11.



Table 27. Exposure of workers to methyl bromide during soil fumigations in greenhouses (2.b).

Work task	Lbs MB /A	Monitoring time (hrs)	MB conc. ppm, v/v*	MB conc.** ppm, v/v	24-hr TWA (ppb)		
					Acute	Subchr.***	Chr.***
Applicator 1	447.75	1.17	3.468	4.81	401	n/a	n/a
Applicator 2	447.75	1.73	6.265	8.69	724	n/a	n/a
				Average	562	n/a	n/a
Tarp venter 1	447.75	0.4	5.766	8.00	333	n/a	n/a
Tarp venter 2	447.75	0.35	0.229	0.32	13	n/a	n/a
Tarp venter 3	447.75	0.6	0.01	0.01	0.6	n/a	n/a
Tarp venter 4	447.75	0.65	0.461	0.64	26.6	n/a	n/a
				Average	93	n/a	n/a
				STDEV	160	n/a	n/a
Tarp remover 1	447.75	1.03	0.038	0.05	2	n/a	n/a
Tarp remover 2	447.75	1.03	0.017	0.02	1	n/a	n/a
Tarp remover 3	447.75	1.37	0.004	0.01	0.2	n/a	n/a
Tarp remover 4	447.75	1.32	0.007	0.01	0.4	n/a	n/a
				Average	1	n/a	n/a
				STDEV	1	n/a	n/a

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for an application rate of 450 lbs MB/A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

One-half of MDL (10 ppb) was used for non-detects.

\*\*\* subchr. (subchronic) and chr. (chronic) were used for the calculation of subchronic and chronic exposures shown in Table 11; hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

### 3. MB monitoring: The Grain Product Group (Hosoda, 1992)

Report No. (status): Not assigned (revised; September 1, 1992)

Study Director (company): Ed Hosoda (Cal Ag-Industrial Supply, Inc.)

Compliance with GLP standards: There was no information to determine whether the study was conducted in compliance with GLP standards.

#### Application information

Formulation: Methyl Bromide 100

Application rate: 1.5-2 Lbs a.i./1,000 ft<sup>3</sup>

Date of application: May to August, 1992

Locations: West Sacramento, Modesto, and Maxwell

Use of tarpaulin: 6 mil polyethylene tarpaulin, if used

Application method:

- Fumigation applicators: MB was introduced from a cylinder into sea containers through ¼" polyethylene tubing. The application rate was 2 Lbs MB/1,000 ft<sup>3</sup>. The application periods were 19.5, 21, and 34 minutes.
- Worker at initiation of aeration of sea containers/truck trailers: The workers opened both doors of the container and placed an insect screen to exclude reentry of flying insects.

Eighteen-inch, 10,000 cfm "Patton" fans were left running for the entire aeration period of 24 hours. The monitoring periods were 3.5, 6, and 8.5 minutes.

- c) Forklift drivers emptying sea containers/truck trailers: Each container had been previously aerated for approximately 24 hours, and had no detectable amount of MB when using a Draeger MB 5/b tube. A forklift operator took about 15 minutes to unload each container contents and place produce inside the warehouse. The monitoring periods were 22, 25, and 41 minutes.
- d) Workers at initiation of aeration of tarpaulin fumigation: A tarp-covered stack of 1,000 ft<sup>3</sup> of blackeye beans was fumigated with 1.5 Lbs MB. The worker removed bags of beans from the outside edge of the tarps, then lifted the edges of the tarps and removed them from the entire stack. The monitoring periods were 4, 7, and 7 minutes.
- e) Forklift drivers emptying non-certified fumigation chambers: Two non-certified chambers with 2,500 ft<sup>3</sup> capacities were used in this study. Each chamber held a variety of rice products, with varying types of packaging. These chambers were aerated until air concentration of MB was below 5 ppm as measured with Draeger MB 5/b tube. Then the forklift operators were allowed to enter the chamber. The monitoring periods were 17, 30, and 32.5 minutes.
- f) Air monitoring in fumigated rice warehouse: After sea containers were fumigated and aerated, the product was brought back to storage in a warehouse. The product consisted of a wide variety of rice products with various types of packaging. Air samples were collected near the surface of rice bags on the pallets. Each monitoring period was 120 minutes.
- g) Workers re-processing fumigated rice products: The previously fumigated rice products were re-processed. Workers opened packages and poured rice into a receptacle which transfers the product into a storage bin. A worker may be required to work a full shift performing this task. The time between the aeration of fumigated rice products and re-processing was not known. Each monitoring period was 60 minutes.

#### Air monitoring study

Work tasks (monitoring time, replicates): Applicators (21-34 min, n=3), workers at initiation of aeration of sea containers/truck trailers (6-8.5 min, n=3), workers at initiation of aeration of tarpaulin fumigation (4-7 min, n=3), forklift drivers emptying sea containers/truck trailers (22-41 min, n=3), forklift drivers emptying non-certified fumigation chambers (17-32.5 min, n=3), air monitoring in rice warehouse (120 min, n=2), workers handled re-processed fumigated rice (60 min, n=3).

Exposure monitoring equipment: The exposure was measured by collecting air samples from the workers' breathing zone using charcoal sampling tubes (400/200 mg charcoal) connected to a personal air sampling pump. The monitoring method followed was that recommended in "Cal/EPA, DPR Methodology for Measuring MB Exposure to Workers" (Ross and Gibbons, 1992). The two charcoal tubes can handle the maximum air volume of 11 liters.

Recovery: The average recovery was 69%.

#### Exposure/data assessment

Air concentrations of MB in submitted study reports were adjusted using the average recovery of 69%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50%

(Biermann and Barry, 1999; Helliker, 1999). MB concentrations were further adjusted by DPR for an application rate of 6 Lbs MB/1,000 ft<sup>3</sup>. Results are shown in Tables 28. Acute and non-acute exposure estimates are shown in Table 11.

Table 28. Exposure of workers to methyl bromide during and after fumigations of grain products (3).

Work task	Lbs MB/ 1,000 ft3	Monitoring time (min)	MB conc.* ppm, v/v	MB conc.** ppm, v/v	24-hr TWA (ppb)		
					Acute	Subchr.***	Chr.***
Monitoring of fumigation applicators:							
Applicator 1	2	19.5	0.797	3.30	825	894	687
Applicator 2	2	21	0.765	3.17	792	858	660
Applicator 3	2	34	3.227	13.36	3,340	3,618	2,783
				Average	1,652	1,790	1,377
				STDEV	1,462	1,584	1,218
Worker at initiation of aeration of sea containers/truck trailers							
Aerator 1	2	6	1.303	5.39	1,349	1,461	1,124
Aerator 2	2	3.5	8.028	33.24	8,309	9,001	6,924
Aerator 3	2	8.5	8.172	33.83	8,458	9,163	7,048
				Average	6,039	6,542	5,032
				STDEV	4,062	4,401	3,385
Workers at initiation of aeration of tarpaulin fumigation							
Aerator 1	1.5	4	0.01	0.06	14	15	12
Aerator 2	1.5	7	0.526	2.90	726	786	605
Aerator 3	1.5	7	0.01	0.06	14	15	12
				Average	251	272	209
				STDEV	411	445	343
Forklift drivers emptying sea containers/truck trailers							
Driver 1	2	22	0.01	0.04	2	1	1
Driver 2	2	41	0.25	1.04	43	22	22
Driver 3	2	25	0.01	0.04	2	1	1
				Average	16	8	8
				STDEV	24	12	12
Forklift drivers emptying non-certifying fumigation chambers							
Driver 1	2	17	0.041	0.17	7	4	4
Driver 2	2	30	0.044	0.18	8	4	4
Driver 3	2	32.5	0.025	0.10	4	2	2
				Average	6	3	3
				STDEV	2	1	1
Air monitoring in fumigated rice warehouse							
Ambient air 1	2	120	0.04	0.17	55	55	55
Ambient air 2	2	120	0.007	0.03	10	10	10
				Average	32	32	32
Workers handled re-processing fumigated rice product							
Worker 1	2	60	0.01	0.04	10	n/a	n/a
Worker 2	2	60	0.01	0.04	10	n/a	n/a
Worker 3	2	60	0.01	0.04	10	n/a	n/a
				Average	10	n/a	n/a
				STDEV	0	n/a	n/a

\* adjusted by the study director for an average recovery of 69%.

\*\* adjusted by DPR for an application rate of 6 lbs MB/1,000 ft<sup>3</sup> and 50% recovery (Biermann and Barry, 1999; Helliker, 1999). One-half of MDL (0.01 ppm) was used for non-detects.

\*\*\* subchr. (subchronic) and chr. (chronic) were used for the calculation of subchronic and chronic exposures shown in Table 11; hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

4. Determination of MB exposure during dried fruit and tree nut fumigation practice (Radian Corporation, 1992)

Report No. (status): RCN 256-254-04-01 (final)

Study Director (company): Radian Corporation

Compliance with GLP standards: The study was not conducted in compliance with GLP standards. There was not a signed copy of the QA statement in the submitted report.

Application information

Formulation: Not reported

Application rate: 0.8-3.0 Lbs a.i./1,000 ft<sup>3</sup>

Date of application: August to October, 1992

Area treated: Sea/land containers, chambers

Use of tarpaulin: No

Application method:

1. Sea van fumigation (contained packages of dried prunes and mixed fruit): Volume of container = 2,200 ft<sup>3</sup>. Application rate = 2.27 Lbs MB/1,000 ft<sup>3</sup>. Hot MB was introduced into the sea van from an outside source. The fumigation time was 17 hours. The van was aerated for two hours after the completion of fumigation.
2. Chamber (contained dried prunes): Volume of chamber = 15,000 ft<sup>3</sup>. Application rate = 0.8 Lbs MB /1,000 ft<sup>3</sup>. Hot MB was injected into the chamber from an outside source. The fumigation time was 20 hours. The chamber was aerated for 6 hours after the completion of fumigation.
3. Big chamber fumigation (contained raisins): Volume of chamber = 143,382 ft<sup>3</sup>. Application rate = 1.5 Lbs MB/1,000 ft<sup>3</sup>. MB was introduced from an outside source through a hose. Distribution of MB in the chamber was assisted by big fans. The fumigation time was 24 hours. The chamber was aerated for 24 hours after the completion of fumigation.
4. Chamber (contained raisins): Volume of two chambers were 45,000 and 55,000 ft<sup>3</sup>. Application rate = 1 lb MB/1,000 ft<sup>3</sup>. Hot MB was injected into the chambers from an outside source. The fumigation time was 24 hours. The chambers were aerated for 24 hours after the completion of fumigation. The fumigated products were removed by forklift to the production line for processing.
5. Fumigation of vacuum chamber and two kinds of non-certified chambers (contained walnuts, shelled and in-shell): Application rate = 3 Lbs MB/1,000 ft<sup>3</sup> for fumigatorium (silo chambers in the main plant) (20 chambers of 2,600 ft<sup>3</sup> each), vacuum chambers (2 chambers of 1,400 ft<sup>3</sup> each), and cleaning plant chambers (8 chambers of 2,000 ft<sup>3</sup>). The fumigation time was 2 hours for all chambers. The aeration times were 6 hours for fumigatorium chambers, 2 hours for vacuum chamber, and 30-45 minutes for cleaning plant chambers. It was noted in the submitted report that the fumigation processes were

performed constantly. Consequently, no separate sampling of aeration and clearing the chamber was possible. The data for all the fumigators represents the combined results of injection, aeration, and clearing operations.

6. Sea van aeration (contained dried unpackaged prunes): Volume of container = 2,200 ft<sup>3</sup>. Application rate = 2.73 Lbs MB/1,000 ft<sup>3</sup>. The fumigation time was 24 hours. The sea van was aerated for 2 hours.

#### Air monitoring study

Work tasks (monitoring time and replicates are shown in Table 29).

1. Sea van fumigation: Fumigator (the loading dock supervisor), fumigation observer (QA supervisor). Sampling times ranged from 19 to 25 minutes. Downwind samples were collected 15 feet away from the entry door. The collection time with respect to the fumigation process was not specified.
2. Chamber fumigation (dried prunes). Fumigator, forklift operator, area samples (1 meter from open door, 2 and 15 meters from chamber), and leak check. Sampling times ranged from 5 to 122 minutes. The area samples (1 m from open door) were collected while the prunes were removed from the chamber. Samples for 2 and 15 meters from the chamber were collected during the fumigation process. The starting time for sample collection with respect to the aeration process was not specified.
3. Big chamber fumigation (raisins): Fumigators, aerators, forklift drivers, catchall operator, hopper operators, capper dumper, inspector, moisture checker at line control, driver of forklift to side hopper, stem pickers, and areas. Sampling times ranged from 22 to 498 minutes. Area samples during the fumigation process were located on a tractor, which pulled the MB application apparatus and on a forklift, which stayed near the shed. During the aeration process, area samples (shed-604, shed-605, shed-606) were set up on each fan associated with these sheds. Exposure of workers in the processing line (forklift drivers, hopper operators, capper and catchall operators) were monitored on the night of the same aeration date. The distance of the processing line from the chambers was not specified. Area samples (capper, hopper and catchall areas) were also collected in the processing portion of the plant during the same workshift.

Exposure of workers in the packaging portion of the plant was also monitored. The distance of the packaging area from the chambers was not specified in the submitted report. Air samples were collected one day after initiation of aeration. Area samples (hopper, stem picker, and filler (packaging) areas) were also collected in this packaging area.

4. Chamber (raisins): Fumigators, aerators, chamber worker, stem pickers, forklift driver, hopper operator, and areas. Sampling times ranged from 5 to 536 minutes. During the fumigation period, area samples were located at both sides of the chamber and attached directly to the cage. Leak check samples were collected at locations approximately 1 foot from the edge of the door. There was no information with respect to the time of collection and the distance of samples from the MB source for aeration and clearing samples.
5. Fumigation of vacuum chamber and two kinds of non-certified chambers (walnuts, shelled and in-shell): Cracking workers, sorters, fumigators, cleaning-sort workers, hopper operators, and areas. Sampling times ranged from 418 to 621 minutes. Information regarding the time of collection and the distance of samples from the source of MB for these area samples were not specified: fumigatorium, vacuum chamber, sorting area, cracking area, and cleaning building. It was assumed that the sampling locations were in the vicinity of these mentioned areas.
6. Sea van aeration: The following samples were taken after opening the doors of the sea van for aeration: upwind of sea van, downwind-left, downwind-right, downwind-center. Sampling times ranged from 15 to 119 minutes.

Exposure monitoring equipment: The exposure was measured by collecting air samples from the workers' breathing zone (20 cm radius circle from the worker's nose and mouth) and work areas using charcoal sampling tubes (400/200 mg charcoal) connected to a personal air sampling pump.

Analysis: The contents of the sampling tube was emptied into a glass headspace vial. Benzyl alcohol was added and the vial was thermostated at 110 °C. The headspace gas was sampled and analyzed by a gas chromatograph equipped with an electron capture detector. A recovery study was not conducted.

#### Exposure/data assessment

Grab samples taken inside the van before aeration and from edges of van during aeration are not shown in this document. The fumigation practices for dried fruit and tree nuts during the study may not in full compliance with current permit conditions. MB concentrations in Table 29 were adjusted by DPR for an application rate of 1.5 and 3.5 Lbs MB/1,000 ft<sup>3</sup>. Acute and non-acute exposure estimates are shown in Table 11.

#### 5. MB: Measurement of exposure to the fumigators, forklift drivers, cherry sorters, and other workers (Stegmiller and Lee, 1992)

Report No. (status): Interim report

Study Director (company): Mr. Frank Stegmiller (Bioentech Incorporated)

Compliance with GLP standards: The study was not conducted in compliance with GLP standards.

#### Application information

Formulation: Not reported

Application rate: 3 Lbs a.i./1,000 ft<sup>3</sup>

Date of application: May 23-25, 1992

Location (area treated): San Joaquin County (3 air-tight fumigation chambers measured 71,000, 46,000, and 22,000 ft<sup>3</sup>). The chambers were constructed primarily of plywood and installed on concrete floors.

Use of tarpaulin: No

Application method: MB was injected into the chambers through a closed gas-tight system from a pressurized cylinder. This task was performed by DPR-certified applicators. Bulk fresh cherries were fumigated for two to three hours. After the completion of fumigation, the gas exhaust system was started and the fresh air inlets were opened to allow aeration of the treated cherries. An aeration period was not mentioned in the submitted report. The commodity was moved from the chamber when the air concentration of MB in the chamber was less than 5 ppm.

#### Air monitoring study

Work tasks (monitoring times and replicates are shown in Table 30).

Exposure monitoring equipment: The exposure was measured by collecting air samples from the workers' breathing zone using charcoal sampling tubes connected to a personal air sampling pump. Area samplers were placed in close proximity of the chamber, the packing, and the gas injection areas.

Analysis and recovery studies: MB was analyzed by gas chromatography following NIOSH Method 2520. Weight of MB from samples was adjusted for the laboratory recovery efficiency, but the percentage of recovery was not disclosed in the submitted report.

#### Exposure/data assessment

The fumigation practices for cherries during the study was not conducted in compliance with current permit conditions. The submitted study report mentioned that air concentrations of MB were adjusted for a recovery. MB concentrations in Table 30 were further adjusted by DPR for an application rate of 5 Lbs MB/1,000 ft<sup>3</sup>. Acute and non-acute exposure estimates are shown in Table 11.

#### Compliance monitoring study conducted by WH&S

On May 30, 1996, staff from the Worker Health and Safety Branch, DPR, conducted a compliance monitoring study to determine the air concentration of MB at the same work site (Gibbons, 1996). Cherries were fumigated with MB for two hours at a rate of 3 Lbs MB/1,000 ft<sup>3</sup>. The fumigated cherries on that day were mechanically aerated for five hours prior to the start of processing. The present permit conditions require a minimum aeration of four hours. Air samples were collected from five locations in the processing building. Air samples were obtained by drawing workplace air through charcoal sorbent tubes during the processing work shift. Results of this study were included in Table 30 for comparison with those obtained from a study previously performed by Bioentech Incorporated.

Table 29. Exposure of workers to MB during and after fumigation of dried fruit and tree nut products (4).

Work task	Lbs MB /1,000 ft3	Monit. time (min)	MB conc.* ppm, v/v	MB conc.** ppm, v/v	24-hr TWA (ppb)		
					Acute	Subchr.***	Chr.***
<b>a) Sea Van:</b>							
Fumigator	2.27	25	0.6	0.79	33	n/a	n/a
Fumigator observer	2.27	25	0.17	0.22	9	n/a	n/a
15-ft downwind 1	2.27	21	0.064	0.08	4	n/a	n/a
15-ft downwind 2	2.27	19	0.035	0.05	2	n/a	n/a
				Average	3	n/a	n/a
<b>b) Chamber (dried prunes):</b>							
Forklift operator	0.8	47	0.0045	0.02	0.35	n/a	n/a
Fumigator	0.8	5	12	45.00	938	n/a	n/a
1 m from open door	0.8	40	0.01	0.04	0.78	n/a	n/a
2 m from chamber	0.8	120	1.8	6.75	141	n/a	n/a
15 m from chamber	0.8	119	0.06	0.23	5	n/a	n/a
Leak check, side seal	0.8	122	170	637.50	13,281	n/a	n/a
<b>c) Big chamber fumigation (raisins):</b>							
Primary fumigator	1.5	33	3.2	6.40	800	667	667
Secondary fumigator	1.5	35	0.47	0.94	118	98	98
Aerator 1	1.5	22	0.22	0.44	55	46	46
Aerator 2	1.5	22	3.7	7.40	925	771	771
				Average	490	408	408
Forklift driver 1	1.5	460	0.33	0.66	69	55	55
Forklift driver 2	1.5	399	0.15	0.30	31	25	25
Forklift driver 3	1.5	452	0.23	0.46	48	38	38
				Average	49	39	39
				STDEV	19	15	15
Catchall operator	1.5	439	0.304	0.61	203	203	203
Hopper operator 1	1.5	456	0.14	0.28	93	93	93
Hopper operator 2	1.5	424	0.34	0.68	227	227	227
				Average	160	160	160
Capper dumper	1.5	432	0.19	0.38	127	127	127
Inspector	1.5	471	0.023	0.05	15	15	15
Moisture checker	1.5	479	0.014	0.03	9	9	9
Forklift to side hopper	1.5	465	0.038	0.08	8	6	6
Stem picker 1	1.5	498	0.042	0.08	28	28	28
Stem picker 2	1.5	451	0.024	0.05	16	16	16
Stem picker 3	1.5	365	0.031	0.06	21	21	21
				Average	22	22	22
				STDEV	6	6	6
Packer 1	1.5	500	0.029	0.06	19	19	19



Table 29 (cont.1). Exposure of workers to MB during and after fumigation of dried fruit and tree nut products (4).

Work task	Lbs MB/ 1,000 ft3	Monit. time (min)	MB conc.* ppm, v/v	MB conc.** ppm, v/v	24-hr TWA (ppb)		
					Acute	Subchr.***	Chr.***
<b>Area samples:</b>							
Shed-Green forklift	1.5	31	0.56	1.12	117	93	93
Shed-Blue tractor	1.5	32	0.83	1.66	173	138	138
Aeration-shed 604	1.5	33	2.8	5.60	700	583	583
Aeration-shed 605	1.5	32	4	8.00	1,000	833	833
Aeration-shed 606	1.5	32	8.7	17.40	2,175	1,813	1,813
				Average	1,292	1,076	1,076
				STDEV	780	650	650
Capper area	1.5	489	0.42	0.84	280	280	280
Hopper area #2	1.5	444	0.091	0.18	61	61	61
Catchoff area	1.5	429	0.19	0.38	127	127	127
Side hopper area	1.5	478	0.034	0.07	23	23	23
Stem picker area-A3	1.5	475	0.015	0.03	10	10	10
Filler area, E-line	1.5	476	0.029	0.06	19	19	19
<b>d) Chamber (raisins):</b>							
Fumigator 1	1	41	0.57	1.71	107	107	71
Fumigator 2	1	40	0.1	0.30	19	19	13
				Average	63	63	42
Aerator 1	1	3	0.34	1.02	64	64	43
Aerator 2	1	3	0.16	0.48	30	30	20
				Average	47	47	31
Clear chamber 1	1	9	7.5	22.50	1,406	1,406	938
Clear chamber 2	1	10	7.8	23.40	1,463	1,463	975
				Average	1,434	1,434	956
Stem picker 1	1	488	0.026	0.08	26	26	26
Stem picker 2	1	486	0.03	0.09	30	30	30
				Average	28	28	28
Forklift driver	1	536	0.02	0.06	3	3	1.0
Hopper operator	1	490	0.019	0.06	19	19	19
Area sampling							
Fumigation chambers	1	33	0.47	1.41	88	88	59
Fumigation cage	1	35	0.29	0.87	54	54	36
Leak check-chamber 4	1	30	0.094	0.28	6	n/a	n/a
Leak check-chamber 5	1	29	0.024	0.07	2	n/a	n/a
				Average	4	n/a	n/a
Aeration-chamber 4	1	8	0.99	2.97	186	186	124
Aeration-chamber 5	1	9	0.25	0.75	47	47	31
				Average	116	116	78
Clearing-chamber 4	1	20	0.14	0.42	26	26	18
Clearing-chamber 5	1	19	0.35	1.05	66	66	44
				Average	46	46	31

Table 29 (cont.2). Exposure of workers to MB during and after fumigation of dried fruit and tree nut products (4).

Work task	Lbs MB/ 1,000 ft3	Monit. time (min)	MB conc.* ppm, v/v	MB conc.** ppm, v/v	24-hr TWA (ppb)		
					Acute	Subchr.***	Chr.***
Hopper area	1	498	0.002	0.01	2	2	2
Hopper area, duplicate	1	498	0.013	0.04	13	13	13
				Average	8	8	8
Stem picker	1	479	0.029	0.09	29	29	29
Stem picker, duplicate	1	479	0.03	0.09	30	30	30
Stem picker	1	486	0.024	0.07	24	24	24
Stem picker	1	475	0.024	0.07	24	24	24
				Average	27	27	27
				STDEV	3	3	3
<b>e) Fumigation of a vacuum and two non-certified chambers (walnut, shelled and in-shell):</b>							
Cracking-worker 1	3	606	1.2	2.80	933	933	n/a
Cracking-worker 2	3	570	1.4	3.27	1,089	1,089	n/a
Cracking-worker 3	3	607	1.3	3.03	1,011	1,011	n/a
Cracking-worker 4	3	600	1.4	3.27	1,089	1,089	n/a
Cracking-worker 5	3	598	1.2	2.80	933	933	n/a
Cracking-worker 6	3	612	1.3	3.03	1,011	1,011	n/a
Cracking-worker 7	3	261	2.3	5.37	1,789	1,789	n/a
Cracking-worker 8	3	508	1.7	3.97	1,322	1,322	n/a
Cracking-worker 9	3	608	1.4	3.27	1,089	1,089	n/a
				Average	1,141	1,141	n/a
				STDEV	269	269	n/a
Sorting-worker 1	3	618	0.51	1.19	397	397	n/a
Sorting-worker 2	3	613	0.67	1.56	521	521	n/a
Sorting-worker 3	3	600	0.81	1.89	630	630	n/a
Sorting-worker 4	3	616	0.99	2.31	770	770	n/a
Sorting-worker 5	3	618	0.71	1.66	552	552	n/a
Sorting-worker 6	3	489	0.77	1.80	599	599	n/a
Sorting-worker 7	3	621	0.72	1.68	560	560	n/a
Sorting-worker 8	3	620	0.92	2.15	716	716	n/a
				Average	593	593	n/a
				STDEV	116	116	n/a
Fumigator 1	3	613	0.23	0.54	123	89	56
Fumigator 2	3	614	0.55	1.28	294	214	134
Fumigator 3-vac. chamber	3	585	1.3	3.03	695	506	316
Fumigator 4-vac. chamber	3	524	2.1	4.90	1,123	817	510
				Average	559	406	254
				STDEV	446	324	203
Cleaning-fumigator	3	589	0.15	0.35	80	58	36
Cleaning-sort 1	3	594	0.93	2.17	723	723	n/a
Cleaning-sort 2	3	596	1.4	3.27	1,089	1,089	n/a
Cleaning-sort 3	3	593	1.1	2.57	856	856	n/a
				Average	889	889	n/a
				STDEV	185	185	n/a

Table 29 (cont.3). Exposure of workers to MB during and after fumigation of dried fruit and tree nut products (4).

Work task	Lbs MB/ 1,000 ft3	Monit. time (min)	MB conc.* ppm, v/v	MB conc.** ppm, v/v	24-hr TWA (ppb)		
					Acute	Subchr.***	Chr.***
Bulk casing worker	3	571	1.1	2.57	856	856	n/a
In-shell-packer 1	3	462	1.2	2.80	933	933	n/a
In-shell-packer 2	3	461	1.3	3.03	1,011	1,011	n/a
				Average	972	972	n/a
Hopper operator	3	619	1	2.33	778	778	n/a
Fumigator	3	418	0.42	0.98	225	163	102
<b>Area sampling:</b>							
Fumigatorium	3	604	0.14	0.33	75	54	34
Sorting area 1	3	645	0.68	1.59	529	529	n/a
Sorting area 2	3	519	0.15	0.35	117	117	n/a
				Average	323	323	n/a
Cracking area	3	582	1.4	3.27	1,089	1,089	n/a
Vacuum chamber area	3	596	2.3	5.37	1,789	1,789	n/a
Cleaning Bldg-fum.	3	600	1.5	3.50	802	583	365
<b>f) Sea van aeration (dried unpackaged prunes):</b>							
Upwind of sea van	3	119	0.18	0.42	9	9	n/a
Downwind-center 1	3	15	0.66	1.54	32	32	n/a
Downwind-center 2	3	45	0.3	0.70	15	15	n/a
Downwind-center 3	3	61	0.16	0.37	8	8	n/a
				Average	18	18	n/a
				STDEV	13	13	n/a
Downwind-left 1	3	15	0.3	0.70	15	15	n/a
Downwind-left 2	3	45	0.22	0.51	11	11	n/a
Downwind-left 3	3	60	0.14	0.33	7	7	n/a
Downwind-right 1	3	16	0.84	1.96	41	41	n/a
Downwind-right 2	3	45	0.31	0.72	15	15	n/a
Downwind-right 3	3	62	0.25	0.58	12	12	n/a
				Average	17	17	n/a
				STDEV	12	12	n/a

\*There was no indication in the report that air concentrations were adjusted for a recovery.

\*\*adjusted by DPR based on rates shown in Appendix A and 50% recovery (Biermann and Barry, 1999; Helliker, 1999).  
One-half of the MDL (10 ppb) was used for non-detects.

\*\*\*subchr. (subchronic) and chr. (chronic) were used for the calculation of subchronic and chronic exposures shown in Table 11; hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

6. Worker exposure and on-site air monitoring studies at a walnut processing facility (Air Toxics LTD, 1995).

Report No. (status): Not assigned (Final)

Study Directors (company): Eric D. Winegar, David B. Curtis, Marie J. Yates (Air Toxics Limited).

Application information

Formulation: Not mentioned.

Application rate: Not mentioned.

Date of studies: 1993 (October 27 and 28; December 20 and 21), and 1994 (March 17 and 18; October 11 and 12).

Location: A walnut processing facility in Stockton.

Application method: The report indicated that methyl bromide was injected into Butler- or Polygon-type chambers. At the end of the fumigation period, chambers were aerated. The Butler chambers had a stack of sorts where the emission point was actually below the apex of the chamber. The Butler chambers were vented by a large fan system at the base of the chambers. The Polygon had no stack, only the openings at the top of the conical rooftop. These chambers were vented by a portable fan system that was inserted into an opening at the base of the chamber.

Air monitoring study

Work tasks/areas: (Monitoring times and replicates are shown in Table 31).

Exposure monitoring equipment: For worker exposure monitoring studies-Two or three tubes of petroleum charcoal sorbent tubes (2 of 200 mg, or 1 of 200 mg and 2 of 100 mg) and personal air sampling pumps. The flow rate was 30-40 mL/min. For area and on-site ambient air monitoring studies, identical sampling and analytical methods as that in the worker exposure monitoring studies were used. In addition, a few samples were collected into stainless steel canisters and analyzed by using the U.S. EPA Compendium method TO-14 (cryofocus GC/MS), which afforded a lower detection limits for those samples. The distance for area and on-site monitoring studies with respect to the source of MB could not be determined from the maps, which were included in the submitted report. The fumigation of walnuts during the peak of the season was continuous. The source of MB could be from the fumigation during the study or off-gassing from previously fumigated walnuts.

Air concentrations of MB from worker exposure and area monitoring studies were calculated and reported as the 24-hour TWA; monitoring times for replicates were not mentioned in the report. On-site ambient air concentrations of MB were reported as ppb; collection times for day- and night-monitoring periods were generally long (See Table 31).

Recovery: Recoveries ranged from 74 to 125%. However, the air concentrations were readjusted by DPR to reflect a recovery of 50% (Biermann and Barry, 1999; Helliker, 1999). The authors of this exposure assessment document did not make any correction to the reported values.

#### Exposure assessment

Air concentrations of MB are shown in three parts: a) worker exposures, b) area air monitoring data, c) on-site ambient air monitoring data. Off-site air monitoring data were not incorporated in this document.

Worker exposure monitoring were also conducted in 1992 (September 16 and 17). However, exposure data obtained from the 1992 studies were not used in this document because those studies were performed prior to modifications of the work practices and environment. The modifications after the 1992 studies included training of staff, increased air ventilation, and other changes in work practices such as the closer of the special cracking operation. The authors of this HS-report assume that these improved work practices and environment are in place at the present. Area sampling studies were conducted on the same dates as those for worker exposure studies in 1993 and 1994.

Air concentrations of MB as the 24-hour TWA for workers and area samples are shown in Table 31. Acute and non-acute exposure estimates are shown in Table 11.

#### Compliance monitoring study conducted by WH&S

On October 19, 1995, staff from the Worker Health and Safety Branch, DPR, conducted a full-shift monitoring study to determine the air concentration of MB at the four selected work stations at the Diamond Walnut facilities in Stockton (Gibbons, 1995). At each work station, three locations were chosen for the monitoring equipment. All samples were obtained as area samples and no personal samples were obtained. At all but one work station, the samplers were placed to sample air believed to be representative MB concentrations to which workers were being exposed. A representative of Air Toxics Limited also collected air samples from the same work stations. Results of this study were included in Table 31 for comparison with those obtained from a study previously performed by Air Toxics Limited.

Table 30. Exposure of workers to MB during and after fumigations of cherries for export in 1992 (5).

Work task/site	Lbs MB/ 1,000 ft3	Monitoring time (hrs)	MB conc.* ppm, v/v	MB conc.** ppm, v/v	24-hr TWA (ppb)		
					Acute	Subchr.***	Chronic***
Control room: start-up							
Start-up at M&R	3	2.4	2.69	6.19	258	n/a	n/a
Start-up at M&R	3	3.42	3.82	8.79	366	n/a	n/a
Start-up at CCEA	3	3	0.6	1.38	58	n/a	n/a
Start-up at CCEA	3	2	0.03	0.07	3	n/a	n/a
				Average	171	n/a	n/a
				STDEV	147	n/a	n/a
Control room: left overnight							
Overnight at M&R	3	8	0.27	0.62	26	n/a	n/a
Overnight at M&R	3	6.7	0.09	0.21	9	n/a	n/a
Overnigh at CCEA	3	8	0.02	0.05	2	n/a	n/a
Overnigh at CCEA	3	6.5	0.08	0.18	8	n/a	n/a
				Average	11	n/a	n/a
				STDEV	10	n/a	n/a
Fumigator							
Start-up at M&R	3	0.17	9.15	21.05	877	n/a	n/a
Start-up at M&R	3	0.17	2.44	5.61	234	n/a	n/a
Start-up at CCEA	3	0.17	0.84	1.93	81	n/a	n/a
Start-up at CCEA	3	0.5	1.21	2.78	116	n/a	n/a
Start-up at CCEA	3	0.17	0.82	1.89	79	n/a	n/a
Start-up at CCEA	3	0.17	2.28	5.24	219	n/a	n/a
				Average	267	n/a	n/a
				STDEV	306	n/a	n/a
Closing-up at M&R	3	0.17	2.28	5.24	219	n/a	n/a
Closing-up at M&R	3	0.17	4.54	10.44	435	n/a	n/a
				Average	327	n/a	n/a
Opening-up at M&R	3	0.5	0.34	0.78	33	n/a	n/a
Opening-up at M&R	3	0.17	0.01	0.02	1	n/a	n/a
Opening-up at M&R	3	0.17	0.63	1.45	60	n/a	n/a
Opening-up at M&R	3	0.17	0.81	1.86	78	n/a	n/a
Opening-up at CCEA	3	0.5	0.62	1.43	59	n/a	n/a
Opening-up at CCEA	3	0.25	1.29	2.97	124	n/a	n/a
Opening-up at CCEA	3	0.25	1.17	2.69	112	n/a	n/a
Opening-up at CCEA	3	0.08	0.01	0.02	1	n/a	n/a
				Average	58	n/a	n/a
				STDEV	46	n/a	n/a
Forklift driver							
at CCEA	3	1.27	0.08	0.18	6	n/a	n/a
at CCEA	3	1.63	0.06	0.14	4	n/a	n/a
at CCEA	3	1.8	0.05	0.12	4	n/a	n/a
at CCEA	3	1	0.11	0.25	8	n/a	n/a
at CCEA	3	1.67	0.08	0.18	6	n/a	n/a
at CCEA	3	0.83	0.08	0.18	6	n/a	n/a
at M&R	3	1	0.65	1.50	47	n/a	n/a
at M&R	3	1	0.19	0.44	14	n/a	n/a
at M&R	3	1	0.08	0.18	6	n/a	n/a
				Average	11	n/a	n/a
				STDEV	14	n/a	n/a

Table 30 (cont.1). Exposure of workers to MB during and after fumigations of cherries for export in 1992 (5).

Work task/site	Lbs MB/ 1,000 ft3	Monitoring time (hrs)	MB conc.* ppm, v/v	MB conc.** ppm, v/v	24-hr TWA (ppb)		
					Acute	Subchr.***	Chronic***
Sorter (average)							
M&R 1	3	5	0.11	0.25	84	n/a	n/a
M&R 2	3	5	0.12	0.28	92	n/a	n/a
M&R 3	3	5	0.1	0.23	77	n/a	n/a
M&R 4	3	1	0.44	1.01	337	n/a	n/a
M&R 5	3	1	0.16	0.37	123	n/a	n/a
M&R 6	3	1.5	0.11	0.25	84	n/a	n/a
M&R 7	3	1	0.14	0.32	107	n/a	n/a
M&R 8	3	0.5	0.27	0.62	207	n/a	n/a
M&R 9	3	1.25	0.34	0.78	261	n/a	n/a
M&R 10	3	1	0.1	0.23	77	n/a	n/a
M&R 11	3	1.23	0.12	0.28	92	n/a	n/a
M&R 12	3	1	0.14	0.32	107	n/a	n/a
CCEA 1	3	4.7	0.1	0.23	77	n/a	n/a
CCEA 2	3	4.6	0.14	0.32	107	n/a	n/a
CCEA 3	3	3.5	0.09	0.21	69	n/a	n/a
CCEA 4	3	1	0.12	0.28	92	n/a	n/a
CCEA 5	3	1	0.12	0.28	92	n/a	n/a
CCEA 6	3	1	0.16	0.37	123	n/a	n/a
				Average	123	n/a	n/a
				STDEV	72	n/a	n/a

Compliance monitoring study (Gibbons, 1996)

Work site	Lbs MB/ 1,000 ft3	Monitoring time (hrs)	MB conc. (ppb)	MB conc.** (ppb)	24-hr TWA (ppb)		
					Acute	Subchr.***	Chronic***
Dump station	3	6.2	31	71.30	24	n/a	n/a
	3	6.2	19	43.70	15	n/a	n/a
	3	6.2	12	27.60	9	n/a	n/a
	3	6.2	19	43.70	15	n/a	n/a
	3	6.2	35	80.50	27	n/a	n/a
				Average	18	n/a	n/a
				STDEV	7	n/a	n/a

M&R and CCEA represent sites of chambers.

\*adjusted by the study director for a recovery, but the percentage of recovery was not indicated in the report.

It was assumed that 69% recovery was used.

\*\*adjusted by DPR for an application rate of 5 lbs MB/1,000 ft3 and 50% recovery (Biermann and Barry, 1999; Helliker, 1999). One-half of MDL (10 ppb) was used for non-detects.

\*\*\*subchr. (subchronic) and chr. (chronic) were used for the calculation of subchronic and chronic exposures shown in Table 11; hours/workday and workdays for subchronic and chronic exposures are shown in Appendix A.

Table 31. Methyl bromide air concentrations obtained from worker exposure studies, and area and on-site air monitoring studies at a walnut processing plant in Stockton (6).

	Work task	24-hour TWA (ppb)				
		10/1993*	10/1994*	Acute	Subchr.**	Chr.**
<b>a) Worker exposure studies</b>	Bulk packaging	26	22			
		37	12			
		0.5				
	Cleaning plant	Average ('93-'94)		39	39	n/a
		STDEV ('93-'94)		28	28	n/a
		224	57			
		34	175			
		223	0.5			
		145	167			
		207	202			
		18	17			
			158			
			85			
			31			
			174			
			10			
			170			
		Average ('93-'94)		233	233	n/a
		STDEV ('93-'94)		165	165	n/a
	Dock 5 area		250	500	500	n/a
	Fumigatorium	1	53			
		2	52			
		0.5	25			
		Average ('93-'94)		45	32	20
		STDEV ('93-'94)		50	37	23
	Packaging	40	22			
		Average ('93-'94)		62	62	n/a
	Vacuum chamber	318	46			
		88	233			
		86	79			
		Average ('93-'94)		283	283	n/a
		STDEV ('93-'94)		216	216	n/a
	Sorting	21	10			
		28	27			
		35	23			
		32	7			
		17	12			
		12	16			
		11				
		20				
		Average ('93-'94)		39	39	n/a
		STDEV ('93-'94)		17	17	n/a



Table 31 (cont. 1). Methyl bromide air concentrations obtained from worker exposure studies, and area and on-site air monitoring studies at a walnut processing plant in Stockton (6).

Work task	24-hour TWA (ppb)				
	10/1993*	10/1994*	Acute	Subchr.**	Chr.**
Special cracking	74	17			
	75	16			
	85	17			
	54	8			
	0.5				
	0.5				
	28				
	52				
	9				
	11				
	24				
	22				
	Average ('93-'94)		62	62	n/a
	STDEV ('93-'94)		56	56	n/a

MDL was 0.1 ug/sample equivalent approx. to a single digit ppb detection limit. Since the lowest value of 1 ppb was reported, one-half of this value (0.5 ppb) was used whenever the MDL was shown in the submitted report.

Work	24-hour TWA (ppb)				
	1993*	1994*	Acute	Subchr.**	Chr.**
<b>b) Area air monitoring studies</b> (background samples)	Meats Pool	63	51		
		6			
		21			
		Average ('93-'94)	71	n/a	n/a
		STDEV ('93-'94)	53	n/a	n/a
	Warehouse ('93) Warehouse isle ('94)	13			
			31		
			28		
			33		
		Average ('93-'94)	53	n/a	n/a
		STDEV ('93-'94)	18	n/a	n/a
	Sorting line	2	40		
			43		
		Average ('93-'94)	57	n/a	n/a
		STDEV ('93-'94)	46	n/a	n/a
	West Alleyway		14	28	n/a
	West Cage Door		10	20	n/a
	East Alleyway		3	6	n/a
	East Cage Door		3	6	n/a

Table 31 (cont. 2). Methyl bromide air concentrations obtained from worker exposure studies, and area and on-site air monitoring studies at a walnut processing plant in Stockton (6).

Sampling date	Chambers and the vicinity	Sampling time (hr)	Air conc. (ppb)*	24-hour TWA (ppb)		
				Acute	Subchr.**	Chr.**
c) On-site ambient air monitoring studies						
10/28/93	Butler 8/9 (the vicinity of fumigation chambers)	6.6	26	17	n/a	n/a
10/28/93	Polygon 19 (the vicinity of fumigation chambers)	6.6	16	11	n/a	n/a
11/19/93	Polygon 20 (the vicinity of fumigation chambers)	2.07	653	435	n/a	n/a
11/19/93	Polygon 20 (the vicinity of fumigation chambers)	2.1	310	207	n/a	n/a
11/19/93	Polygon 20 door (1,575 lbs. inj.)	2.08	280	187	n/a	n/a
			Average	171	n/a	n/a
			STDEV	174	n/a	n/a
					n/a	
10/28/93	Polygon 20 (within 20' of the injection)	0.167	2100	1400	n/a	n/a
11/19/93	Polygon 20 (within 20' of the injection)	2.13	10200	6800	n/a	n/a
			Average	4100	n/a	n/a
12/16/93	East fence	3.68	1.9	1	n/a	n/a
12/16/93	North gate	3.65	7.0	5	n/a	n/a
12/16/93	South center fence	3.62	2.1	1	n/a	n/a
12/16/93	West fenceline	3.47	2.1	1	n/a	n/a
12/16/93	Butler 3 vent area	0.4	5.4	4	n/a	n/a
			Average	2	n/a	n/a
			STDEV	2	n/a	n/a
12/20/93	Butler 11	2.95	243	162	n/a	n/a
12/20/93	Butler 12	30.07	2900	1933	n/a	n/a
12/20/93	Butler 13/14	3.3	264	176	n/a	n/a
12/20/93	Butler 13/15	3.08	48	32	n/a	n/a
			Average	576	n/a	n/a
			STDEV	907	n/a	n/a
12/20/93	East fenceline	3.88	2.9	2	n/a	n/a
12/20/93	East fenceline	3.07	6.9	5	n/a	n/a
12/20/93	North fenceline	3.6	2.7	2	n/a	n/a
12/20/93	North fenceline	3.08	4	3	n/a	n/a
12/20/93	North gate	3.78	2.2	1	n/a	n/a
12/20/93	North gate	3.05	2.9	2	n/a	n/a
			Average	2	n/a	n/a
			STDEV	1	n/a	n/a

Notes: Fumigation chamber types.

a) Polygon: vol. 671,000&959,000 ft3, stack height 80 ft (openings are at the top of the conical rooftop), fan flow rate 14,400 CFM (sum of two ports). b) Butler: vol. 151,000 ft3, stack height 65 ft, fan flow rate 1,750 CFM.

Both chamber types do not have the standard stack height, which is 10' above the highest point of the chamber.

Before the study was conducted, those chambers have not been USDA pressure tested.

Table 31 (cont. 3). Methyl bromide air concentrations obtained from worker exposure studies, and area and on-site air monitoring studies at a walnut processing plant in Stockton (6).

Sampling date	Chambers and the vicinity	Sampling time (hr)	Air conc. (ppb)*	24-hour TWA (ppb)		
				Acute	Subchr.**	Chr.**
12/20/93	Polygon 20, on door	0.33	6.5	4	n/a	n/a
12/20/93	Polygon 20 area	3.8	2.8	2	n/a	n/a
12/20/93	Polygon 20 area	3.02	4.5	3	n/a	n/a
12/20/93	Polygon 20 area	3.03	5.4	4	n/a	n/a
12/20/93	Polygon 20 area	1.32	7.9	5	n/a	n/a
12/20/93	Butler 12	2.57	4.3	3	n/a	n/a
12/20/93	Butler 13/14	2.6	19	13	n/a	n/a
			Average	5	n/a	n/a
			STDEV	4	n/a	n/a
12/20/93	South center fence	3.2	4.4	3	n/a	n/a
12/20/93	South center fence	3.08	3.5	2	n/a	n/a
12/20/93	West fenceline	3.8	3.3	2	n/a	n/a
12/20/93	West fenceline	3.03	5.7	4	n/a	n/a
12/20/93	South center fence	3.08	3.5	2	n/a	n/a
			Average	3	n/a	n/a
			STDEV	0.7	n/a	n/a
(Notes: wind speed on 12/20/93 ranged from 2.2-10.8 mph; temp (oC) ranged from 2.2-4.4; "xx" ppb was used when it was reported as "< xx" ppb)						
3/11/94	Butler 11	5.02	121	81	n/a	n/a
3/11/94	Butler 4	4.05	2200	1467	n/a	n/a
3/11/94	Butler 16/17	4.02	143	95	n/a	n/a
			Average	548	n/a	n/a
			STDEV	796	n/a	n/a
3/17/94	Butler 1	5.23	7.1	5	n/a	n/a
3/17/94	Butler 15/16	5.25	36	24	n/a	n/a
3/17/94	Butler 17/18	5.27	70	47	n/a	n/a
3/17/94	Butler 2	3.92	15	10	n/a	n/a
3/17/94	Butler 11/12	3.92	2.3	2	n/a	n/a
			Average	17	n/a	n/a
			STDEV	18.5	n/a	n/a
3/17/94	North fenceline	5.5	2.1	1	n/a	n/a
3/17/94	South center fenceline	5.25	53	35	n/a	n/a
3/17/94	South center fenceline	3.95	7.9	5	n/a	n/a
			Average	14	n/a	n/a
			STDEV	18.6	n/a	n/a

(Notes: wind speed on 3/17/94 ranged from 4.8-9.5 mph; temp (oC) ranged from 9.4-19.8)

Table 31 (cont. 4). Methyl bromide air concentrations obtained from worker exposure studies, and area and on-site air monitoring studies at a walnut processing plant in Stockton (6).

Sampling date	Chambers and the vicinity	Sampling time (hr)	Air conc. (ppb)*	24-hour TWA (ppb)		
				Acute	Subchr.**	Chr.**
10/25/94-Day	Lamp post	13.15	3.8	6.3		
10/25/94-Night	Lamp post	10.76	2.5			
10/26/94-Day	Lamp post	12.32	1.6	3.8		
10/26/94-Night	Lamp post	11.48	2.2			
			Average	5	n/a	n/a
10/25/94-Day	North fence	12.7	1.9	5.8		
10/25/94-Night	North fence	12.03	3.9			
10/26/94-Day	North fence	11.25	20	21.9		
10/26/94-Night	North fence	12.1	1.9			
			Average	14	n/a	n/a
10/25/94-Night	North gate	11.85	1.8	3.6		
10/26/94-Day	North gate	3.28	6	7.9		
10/26/94-Night	North gate	11.33	1.9			
			Average	6	n/a	n/a
10/25/94-Day	Pallets	12.88	1.8	8.9		
10/25/94-Night	Pallets	11.33	7.1			
10/26/94-Day	Pallets	11.85	26	64		
10/26/94-Night	Pallets	11.33	38			
			Average	36	n/a	n/a
10/25/94-Day	Polygon fence	10.17	8.6	21.6		
10/25/94-Night	Polygon fence	12.65	13			
10/26/94-Day	Polygon fence	12.38	1.6	3.7		
10/26/94-Night	Polygon fence	11.43	2.1			
			Average	13	n/a	n/a
10/25/94-Day	Polygon ramp	11.08	45	47.2		
10/25/94-Night	Polygon ramp	10.95	2.2			
10/26/94-Day	Polygon ramp	12.13	55	72		
10/26/94-Night	Polygon ramp	11.43	17			
			Average	60	n/a	n/a
10/25/94-Night	Rooftop	12.27	6.6	13.2		
10/26/94-Night	Rooftop	11.35	8.1	1		
			Average	7	n/a	n/a
10/25/94-Day	Scale house	12.6	18	24.9		
10/25/94-Night	Scale house	11.67	6.9			
10/26/94-Day	Scale house	11.548	7.9	12.3		
10/26/94-Night	Scale house	11.32	4.4			
			Average	19	n/a	n/a

Table 31 (cont. 5). Methyl bromide air concentrations obtained from worker exposure studies, and area and on-site air monitoring studies at a walnut processing plant in Stockton (6).

Sampling date	Chambers and the vicinity	Sampling time (hr)	Air conc. (ppb)*	24-hour TWA (ppb)		
				Acute	Subchr.**	Chr.**
10/25/94-Day	South center fence	13	7.4	11.2		
10/25/94-Night	South center fence	11.1	3.8			
10/26/94-Day	South center fence	12	37	45.7		
10/26/94-Night	South center fence	11.45	8.7			
10/25/94-Day	South west fence	12.93	1.5	3.3		
10/25/94-Night	South west fence	11.33	1.8			
10/26/94-Day	South west fence	11.83	15	20		
10/26/94-Night	South west fence	11.33	5			
			Average	20	n/a	n/a
			STDEV	18	n/a	n/a
10/25/94-Day	Storage area	6.73	2.3	4.3		
10/25/94-Night	Storage area	11.12	2			
10/26/94-Day	Storage area	11.9	1.1	3.3		
10/26/94-Night	Storage area	9.17	2.2			
			Average	4	n/a	4
10/25/94-Day	Warehouse dock	12.85	9.8	24.8		
10/25/94-Night	Warehouse dock	11.52	15			
10/26/94-Day	Warehouse dock	11.7	165	198		
10/26/94-Night	Warehouse dock	11.33	33			
			Average	111	n/a	111
10/25/94-Night	West fence	12.32	4.3	8.6		
10/26/94-Day	West fence	3.37	6.9	12.2		
10/26/94-Night	West fence	11.5	5.3			
			Average	10	n/a	n/a
<b>d) Compliance monitoring (Gibbons, 1995) (10/19/95)</b>						
Sorting line in cleaning plant (12-hr shift)						
	Nut exit - sorting line #1	12	287	287		
	Nut exit - sorting line #2	12	324	324		
	Nut entrance manifold, line #2	12	343	343		
			Average	318	318	n/a
			STDEV	28	28	n/a
Cello packaging of in-shell walnuts in main building (9-hr shift)						
	Packing machine #11 - power box	2.9	485	364		
	Packing machine #9 - power box	8.5	435	326		
	Column by boxing person near #9	8.5	500	375		
			Average	355	355	n/a
			STDEV	26	26	n/a

Table 31 (cont. 6). Methyl bromide air concentrations obtained from worker exposure studies, and area and on-site air monitoring studies at a walnut processing plant in Stockton (6).

Sampling date	Chambers and the vicinity	Sampling time (hr)	Air conc. (ppb)*	24-hour TWA (ppb)		
				Acute	Subchr.**	Chr.**
Bulk packaging of in-shell walnuts in main building (11-hr shift)						
	Column by stitching station	10.7	264	242		
	Control panel - bag filling	9.6	267	245		
	On stitching machine	10.7	void	-		
			Average	243	243	n/a
Truck dumping work station near dock 5 area						
	Foreman's desk top	10.7	402	369	369	369
	Foreman's desk, phone box shelf	10.8	31	28	28	28
	Fence between chamber 2 and 3	10.7	523	479	n/a	n/a

\* as shown in the submitted report. It was assumed that air concentrations were adjusted using the mid-point recovery (99.5%) of a recovery range of 74-125%.

\*\* The calculation procedure for daily non-acute exposures are as follows:

Daily subchronic MB conc. = (Daily acute MB conc. x daily subchronic exposure time (hrs))/daily acute exposure time (hours). The same method was used for the calculation of daily chronic exposures.

Acute, subchronic and chronic exposures were adjusted for 50% recovery.

## 7. Space-type fumigation: Potential worker exposure to MB at a brewery facility (Gibbons, 1994).

### Application information

Formulation: Not mentioned

Application rate: Not mentioned

Date of application: November 26, 1992

Location (area treated): Fairfield (area was not known)

Use of tarpaulin: No

Application method: During the application of fumigation, two applicators wearing Self-Contained Breathing Apparatus (SCBA) made repeated entry into the grain storage and processing areas to open pre-placed small MB canisters and large cylinders. The canisters were used to treat the inside of numerous enclosed pipes and other equipment which were used for transferring the grain. The large cylinders were used to treat the enclosed air spaces surrounding the equipment. After the fumigation was done, the fumigated area was left undisturbed for 24 hours. During the aeration phase, two workers wearing SCBA made two entries into the space to initiate the aeration. Work tasks during application and aeration are listed in Table 32.

### Air monitoring study

Work tasks (monitoring time, replicates): Applicators (5-36 min, n=4), aerators (6-24 min, n=4).

Exposure monitoring equipment: Not reported

Recovery: Not reported

### Exposure assessment

DPR conducted the monitoring study designed to gather data on potential worker exposure associated with the space-type fumigation at a brewery facility and during the aeration on the

following day. Results are shown in Table 32. The air concentrations as shown are potential exposure and not actual exposure. Acute and non-acute exposure estimates are shown in Table 11.

Table 32. Monitoring of methyl bromide during space fumigation and aeration at a brewery facility (7).\*

Activity	Monit. time (minutes)	MB conc. (ppm)	Protection factor-PF**	Estimated exposure (ppb)	Estimated exposure, ppb*** (24-hr TWA)
a) Applicator (one applicator, 4 samples (s))					
Appl. 1, s 1- entry to open canisters	14	298	10,000	29.8	
Appl. 1, s 2 - reentry to open canisters	36	3624	10,000	362.4	28.9
Appl. 1, s 3 - reentry to open canisters	11	3871	10,000	387.1	
Appl. 1, s 4 - reentry to open large cylinders	5	6117	10,000	611.7	
Area sample (door to buffer zone)	1530	635	10,000	63.5	42
b) Aerator (two aerators, 4 samples)					
Aerator 1, s 1	24	7016	10,000	701.6	
Aerator 1, s 2	20	169	10,000	16.9	24
Aerator 2, s 1	19	9546	10,000	954.6	
Aerator 2, s 2	6	11.4	10,000	1.14	25
				Average	25
Area sample (left of entrance door)(*)	70	0.26	n/a	260	173
Area sample (on applicator's truck)(*)	55	0.15	n/a	150	100

\* workers wore SCBA during the application and aeration processes. Detected MB concentrations represent potential exposures.

\*\* a protection factor (PF) (NIOSH, 1987) was used to derive estimated exposure.

\*\*\* calculated based on serial sampling for an applicator and two aerators. It was assumed that the indicated monitoring times were similar to actual exposure times. Exposures were adjusted by DPR for 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

(\*) It was assumed that workers may work in areas where samples were collected under area samples during aeration; SCBA are not typically used by these workers.

## Appendix C

### Residential Exposure Studies

DowElanco submitted a study conducted by the University of Florida in support of sulfuryl fluoride registration (Bloomcamp *et al.*, 1991). The same report also contained data on MB indoor air concentrations after subsequent aeration of 10 fumigated homes. These homes were fumigated with MB at a rate of 16 g/m<sup>3</sup> and thereafter aerated to 5 ppm according to U. S. EPA-approved procedures. However, the air concentration substantially increased ( $19.2 \pm 10.9$  ppm) after the doors and windows were closed for two hours. Homes were aerated and closed again. During the second 2-hour closure, MB concentration increased above 5 ppm in four homes ( $18.6 \pm 5.4$  ppm). This study was conducted to better characterize the fate of indoor air concentrations of the fumigant following aeration.

A second submitted report related to indoor fumigation was conducted because of a request to modify a method to release MB into the fumigated structure (Soil Chemicals Corp., 1980). Results from three tests indicated that equilibrium of the fumigant can be best achieved by shooting gas into the attic. Data indicated that the gas initially tends to move in a downward direction. When the gas was shot into the living space, the attic was the last area to reach equilibrium. This report did not provide appropriate indoor air concentration to estimate exposure of residents.

#### 8.a. Residents/bystanders (outdoor and indoor air concentrations of MB near fumigated single-family houses (Gibbons *et al.*, 1996a).

Report No. (status): HS-1717 (final)

Study Director (Affiliation): Dennis Gibbons (WH&S, DPR)

#### Application information

Formulation: 99.5% MB, 0.5% chloropicrin (Meth-O-Gas)

Application rate: 3 Lbs formulated product/1,000 ft<sup>3</sup>

Date of application: Winter and Spring of 1993, 1994

Location (area treated): A house in the former Mather Air Force Base, Sacramento, CA.

Use of tarpaulin: Yes

Application method:

Prior to each fumigation, a two- or three-man crew used industry-standard tarpaulins to fully cover a single-family house. Sand-filled canvas tubes (sand snakes) were used to seal the edges of the tarpaulins near the soil. The crew then set up the injection system, consisting of a 150-pound MB tank, a high-pressure hose connected to a propane-powered water heater to warm the gas, and an injector hose which was extended into the house. It took about 25 minutes to inject 62 Lbs of MB into the house which had a volume of about 20,700 ft<sup>3</sup>. The fumigation was conducted in the morning and lasted about 22-24 hours. The same house was fumigated seven different times (replicates).



#### Air monitoring study

Indoor monitoring (time (hours), replicates): 24, n=27 (excluded a house with faulty sewer connection). Samples of air were collected from five neighboring houses. The sampling stations were set in rooms closest to the fumigated house. Three houses were within about 50 feet of the fumigated house. Two other houses were within about 100 feet of the fumigated houses. All door and windows were kept closed during sample collection, with only intermittent front door opening to replace sampling media. Air samples were collected using petroleum-based charcoal tubes (400/200 mg charcoal) connected to air sampling pumps. These tubes were elevated 4-5 feet above the floor. All samplers were calibrated to draw no more than 10 to 11 liters of air through each set of sampling tubes in a sampling period. Just before each study, background air samples were also collected in each house, including the fumigated structure.

Exterior monitoring time (hours, replicates): 24, n = 44. The exterior monitoring study used the same air pump and sampling media set-up for indoor air monitoring. Air samples were collected 10 feet from the outer surface of the tarpaulin. Air samples collected at 50 feet (n = 3) from the outer surface of the tarpaulin yielded no detectable MB. Air sampling media were elevated 4-5 feet above the ground. For the 24-hour sample collection, charcoal tubes were replaced with new ones after about 12 hours of collection. Air sampling was initiated a few minutes after the fumigation crew began the injection of the gas.

Exposure monitoring equipment: Petroleum-based charcoal tubes (primary-400 mg of charcoal and secondary (backup)-200 mg charcoal), air sampling pumps, metal stake used to hold sampling tube 4-5 feet above the ground, charger unit for long-term powering of the pump. All samplers were calibrated to draw no more than a total of 10 to 12 liters of air through the sampling tubes in a sampling period.

Analysis (recovery): MB in sampling tubes was extracted with ethyl acetate. The extract was analyzed by gas-liquid chromatography equipped with electron-capture detector. Lab spiked recovery studies were conducted using three levels of MB ( $\mu\text{g}$ ): High (8.52), medium (4.26 and 2.26), and low (0.85 and 1.13). The average analytical recovery was 71.4% (49-102%). Average recovery was used to adjust MB air concentration data. This study was not conducted in compliance with GLP (40 CFR 160) of the U.S. Environmental Protection Agency.

#### Exposure/data assessment

Results are shown in Table 33. The authors have determined that residents who live in or nearby fumigated homes will not have subchronic or chronic exposure to MB because continuous fumigation of neighboring homes does not occur.

Table 33. Outdoor and indoor air concentrations of MB near fumigated single-family houses (8.a)

**Before correction for 50% recovery.**

	Distance (ft)	Replicate	Range (ppm)			
			Mean	Minimum***	Maximum	95th percentile
<b>Outdoor air*</b>	10	44	0.261	0.019	1.495	0.665
<b>Indoor air**</b>	Neighboring house	27	0.012	0.012	0.203	0.081

**After correction for 50% recovery.**

	Distance (ft)	Replicate	Range (ppm)			
			Mean	Minimum***	Maximum	95th percentile
<b>Outdoor air*</b>	10	44	0.522	0.038	2.990	1.330
<b>Indoor air**</b>	Neighboring house	27	0.024	0.024	0.406	0.162

\* at 10 feet outside the tarpaulin that enclosed the fumigated house. MB air concentrations were adjusted by DPR for 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

\*\* rooms closest to the fumigated house at the distance of about 50-100 feet. Results excluded data from a house with faulty sewer connection.

\*\*\* the non-detectable level was less than 0.012 ppm.

**8.b. Residents/bystanders (downwind outdoor and indoor air concentrations of MB during aeration of fumigated single-family houses (Gibbons *et al.*, 1996b).**

Report No. (status): HS-1713 (final)

Study Director (Affiliation): Dennis Gibbons (WH&S, DPR)

**Application information**

Formulation: 99.5% MB, 0.5% chloropicrin

Application rate: 3 Lbs formulated product/1,000 ft<sup>3</sup>

Date of application: Winter and Spring of 1993, 1994

Location (area treated): A house in the Former Mather Air Force Base, Sacramento, CA.

Use of tarpaulin: Yes

Application method:

Prior to each fumigation, a two- or three-man crew used industry-standard tarpaulins to fully cover a single-family house. Sand-filled canvas tubes (sand snakes) were used to seal the edges of the tarpaulins near the soil. The crew then set up the injection system, consisting of a 150-pound MB tank, a high-pressure hose connected to a propane-powered water heater to warm the gas, and an injector hose which was extended into the house. It took about 25 minutes to inject 62 Lbs of MB into the house which has a volume of about 20,700 ft<sup>3</sup>. The fumigation was conducted in the morning and lasted about 22-24 hours. The same house was fumigated seven different times (replicates).

The crew aerated the house 22 to 24 hours after application of MB. The two aeration methods used were the standard method and the method used by the Pest Control Operators of California (PCOC, 1994). In addition to procedures used in the first method, the PCOC

method requires that before the tarpaulins are removed, a fan be used to exhaust the fumigant-containing air upward from the space between the tarpaulin and the house (innerspace). This procedure lasts 15 minutes. The PCOC method is required by present permit conditions and it is the industry standard aeration method. Hence, air concentrations of MB used in this document are those based on the PCOC aeration method.

#### Air monitoring study

Exterior monitoring (time, replicates):

Collection of air samples downwind from the fumigated house: 10 feet (1 hr, 24 hrs; n=36), 50 feet (1 hr, 24 hrs; n=19), 100 feet (1 hr, 24 hrs; n=18). For the 24-hour sample collection, charcoal tubes were replaced with new ones after 10-12 hours of collection. Air sampling was initiated just prior to the crew removing the first clip or sandsnake.

Indoor monitoring (time (hours), replicates):

Samples of air were collected from five neighboring houses. The sampling stations were set in rooms closest to the fumigated house. Three houses were within about 50 feet of the fumigated house. Two other houses were within about 100 feet of the fumigated houses. All door and windows were kept closed during sample collection, with only intermittent front door opening to replace sampling media. Air sampling tubes were elevated 4-5 feet above the floor. Just before each study, background air samples were also collected in each house, including the fumigated structure.

Exposure monitoring equipment: Petroleum-based charcoal tubes (primary-400 mg of charcoal and secondary (backup)-200 mg charcoal), air sampling pumps, metal stake used to hold sampling tube 4-5 feet above the ground, charger unit for long-term powering of the pump. All samplers were calibrated to draw no more than a total of 10 to 12 liters of air through the sampling tubes in a sampling period.

Analysis (recovery): MB in sampling tubes was extracted with ethyl acetate. The extract was analyzed by gas-liquid chromatography equipped with electron capture detector. Lab spiked recovery studies were conducted using three levels of MB ( $\mu\text{g}$ )-high (8.52), medium (4.26 and 2.26), and low (0.85 and 1.13). The average analytical recovery was 71.4% (49-102%). Average recovery was used to adjust MB air concentration data. This study was not conducted in compliance with GLP (40 CFR 160) of the U.S. Environmental Protection Agency.

#### Exposure/data assessment

Results are shown in Table 34. The authors have determined that residents who live in or nearby fumigated homes will not have subchronic or chronic exposure to MB because continuous fumigation of neighboring homes does not occur.

Table 34. Downwind outdoor and indoor air concentrations of MB during aeration of fumigated single-family houses (8.b).

**Before adjustment for 50% recovery.**

	Distance (ft)	Replicate	Range (ppm)		
			Mean	Minimum**	Maximum
<b>Outdoor air</b>	10	19	0.148	0.012	0.532
	50	10	0.04	0.012	0.104
	100	9	0.02	0.012	0.037
<b>Indoor air</b>	Neighboring house	12	0.03	0.012	0.084

**After adjustment for 50% recovery.**

	Distance (ft)	Replicate	Range (ppm)		
			Mean	Minimum**	Maximum
<b>Outdoor air</b>	10	19	0.296	0.024	1.064
	50	10	0.080	0.024	0.208
	100	9	0.040	0.024	0.074
<b>Indoor air</b>	Neighboring house	12	0.060	0.024	0.168

\* adjusted by DPR for 50% recovery (Biermann and Barry, 1999; Helliker, 1999).

\*\* the non-detectable level was less than 0.012 ppm.

## 9. Exposure of residents to methyl bromide during reentry into fumigated houses.

Residents can be exposed to airborne MB after reentry into their fumigated houses following aeration. MB product labels require a minimum active aeration period (e.g., using fans) of 72 hours and the level of MB must be less than 3 ppm measured in the ground receptacle of an interior electrical outlet or other enclosed space within the wall or an interior and a perimeter wall. The aeration period must last for a minimum of 7 days if non-mechanical or natural ventilation is used.

According to the current MB product labels, general fumigation rates range from 1 to 3 Lbs MB 99.5% per 1,000 ft<sup>3</sup>. Under adverse conditions, the fumigation rate may be increased from 3 ½ to 3 ¾ Lbs per 1,000 ft<sup>3</sup>. In 1995, Southern California counties used 529,390 Lbs MB or 88% of total MB used for structural fumigation (Table 35) (EM&PM, 1998). A typical structural fumigation rate used in these counties was 1.5 Lbs MB/1,000 ft<sup>3</sup> (Sansone, 1998). A fumigation rate of 1.25 Lbs MB/1,000 ft<sup>3</sup> has also been used for some bigger projects. For structural fumigation in Northern California, typical structural fumigation rates for the control of dry wood termites ranged from 2 to 2.5 Lbs MB/1,000 ft<sup>3</sup> and that for powder post beetles ranged from 2.5 to 3.0 Lbs MB/1,000 ft<sup>3</sup> (Sansone, 1998). For residential exposure estimation, a fumigation rate of 1.5 Lbs MB/1,000 ft<sup>3</sup> was used for structural fumigation in Southern California and a fumigation rate of 3.0 Lbs MB/1,000 ft<sup>3</sup> was used for structural fumigation in Northern California.

Scheffrahn *et al.* (1992) conducted a study in 1990 that demonstrated MB levels were greater than 5 ppm in fumigated houses after aerated to less than 5 ppm and subsequently closed. Consequently, the Worker Health and Safety Branch conducted studies in 1992 to determine MB concentrations in fumigated houses after active aeration (Gibbons, 1992). These houses were fumigated with MB at a rate of 1.5 Lbs/1,000 ft<sup>3</sup>.

Consolidated air concentrations of MB measured in five houses after a 24-hour active aeration period are shown in Table 36 under measured MB concentrations. Air concentrations measured in a house identified as "Site Six" (Gibbons, 1992) was not included because of a short sampling period. The MB concentrations from five houses ranged from 0.070 ppm to 1.740 ppm depending on the sampling time. A regression line for MB concentrations was generated by using a scientific software SigmaPlot™ (Jandel Scientific, 1994) and is shown in Figure 1.

There were no measurements for MB concentrations after 92 hours as shown in Table 36. A regression analysis was performed to extrapolate air concentrations (for a fumigation rate of 1.5 Lbs MB/1,000 ft<sup>3</sup>) beyond 24-hour aeration generated by using a scientific software SigmaPlot™ (Jandel Scientific, 1994). This extrapolation was done in order to estimate MB concentrations after 72 hours of active aeration. The exposure of residents was assumed to occur during a 7-day period following 72-hour aeration. Thereafter, MB in the fumigated houses would be dissipated and residents would not be subjected to subchronic exposure as defined by Sanders (1998) (e.g., more than 30-day exposure in a 90-day period). The MB data were extrapolated after 48 hours to 216 hours (216 - 48 = 168 hours or 7 days) after 72 hour aeration (24 + 48 hrs). The MB air concentrations of 86 ± 73 ppb (range 15 - 229 ppb) for subacute exposure during the 7-day period following 72-hour aeration are shown in Table 37. The regression line is shown in Figure 2.

A similar extrapolation was performed for the MB data based upon a fumigation rate of 3 Lbs MB/1,000 ft<sup>3</sup>, which is a typical rate used in Northern California counties (Sansone, 1998). The mean MB concentration for subacute exposure is 172 ± 147 ppb (range 30 - 458 ppb).

A regulatory limit of 210 ppb is used for acute exposure of residents during reentry into fumigated houses because there was no actual MB measurement. Without actual exposure data, the use of this regulatory limit should be more reliable than using an estimated exposure. The following calculations demonstrate that the use of 210 ppb for acute exposure of residents, who live in fumigated houses or houses located near fumigated fields or commodity fumigation facilities, is appropriate.

$$\begin{array}{ll}
 \text{Ideal gas law} & C_1 V_1 = C_2 V_2 \\
 \text{Or} & C_2 = (V_1/V_2) C_1 \\
 \text{Active ventilation (e.g., 3,000 ft}^3\text{/min) period} & 3 \text{ days} \\
 \text{MB levels in wall voids (V}_1\text{) (measured in electrical sockets)} & 3 \text{ ppm (C}_1\text{)} \\
 \text{Exposure potential to reoccupants (C}_2\text{) in fumigated houses (V}_2\text{):} & \\
 \text{WV/DV(or V}_1\text{/V}_2\text{)} & = 0.056 \pm 0.004 \text{ (Johnson, 1992)} \\
 C_2 & = 0.056 \times 3,000 \text{ ppb} \\
 & = \underline{168 \text{ ppb}}
 \end{array}$$

(WV, wall volume; DV, dwelling volume)

Table 35. Use of methyl bromide in structural fumigations in California in 1995

County	Lbs MB	
	California	So. CA county
Alameda	4,610	
Amador	447	
Butte	146	
Calaveras	356	
Colusa	111	
Contra Costa	2,074	
El Dorado	433	
Fresno	1,210	
Humbolt	80	
Kern	488	
Kings	199	
Lake	351	
Los Angeles	389,346	389,346
Madera	405	
Marin	5,148	
Mariposa	121	
Mendocino	1,145	
Merced	224	
Monterey	4,645	
Napa	1,458	
Nevada	235	
Orange	114,320	114,320
Placer	1,100	
Riverside	13,990	13,990
Sacramento	9,504	
San Benito	95	
San Bernadino	9,060	9,060
San Diego	2,294	2,294
San Francisco	221	
San Juaquin	7,792	
San Luis Obispo	1,739	
San Mateo	5,231	
Santa Barbara	380	380
Santa Clara	2,057	
Santa Cruz	3,196	
Solano	1,093	
Sonoma	7,697	
Stanislaus	3,083	
Sutter	734	
Tulare	233	
Tuolumne	334	
Ventura	383	
Yolo	651	
Yuba	235	
Total lbs MB used	598,654	529,390

Percentage of MB used in Southern (So.) California counties

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Table 36. Dissipation of methyl bromide from five houses in Southern California after actively aerated before closing windows<sup>a</sup>.

After 24-hour aeration			After 72-hour aeration	
Hours	Measured MB (ppm) <sup>b</sup>		Hours	Extrapolated MB (ppm) <sup>c</sup>
3.000	1.325		49.000	0.564
4.000	0.115		50.000	0.554
5.000	1.005		51.000	0.543
6.000	1.385		52.000	0.533
13.000	0.580		53.000	0.523
17.000	0.353		54.000	0.513
18.000	0.505		55.000	0.504
20.000	1.740		56.000	0.494
24.000	0.400		57.000	0.485
27.000	0.243		58.000	0.476
28.000	0.135		59.000	0.467
31.000	0.195		60.000	0.458
37.000	0.620		61.000	0.450
40.000	0.765		62.000	0.441
41.000	0.325		63.000	0.433
44.000	0.250		64.000	0.425
46.000	0.345		65.000	0.417
48.000	0.335		66.000	0.409
50.000	0.590		67.000	0.402
52.000	0.140		68.000	0.394
54.000	0.145		69.000	0.387
62.000	0.380		70.000	0.380
65.000	0.565		71.000	0.372
66.000	0.120		72.000	0.365
67.000	0.095		73.000	0.359
69.000	0.225		74.000	0.352
71.000	0.175		75.000	0.345
73.000	0.405		76.000	0.339
78.000	0.085		77.000	0.333
85.000	0.170		78.000	0.326
88.000	0.190		79.000	0.320
92.000	0.070		80.000	0.314
			81.000	0.308
			82.000	0.303
			83.000	0.297
			84.000	0.291
			85.000	0.286
			86.000	0.281
			87.000	0.275
			88.000	0.270

Table 36 (cont. 1). Dissipation of methyl bromide from five houses in Southern California after actively aerated before closing windows<sup>a</sup>.

After 72-hour aeration			After 72-hour aeration	
Hours	Measured MB (ppm) <sup>b</sup>		Hours	Extrapolated MB (ppm) <sup>c</sup>
89.000	0.265		129.000	0.125
90.000	0.260		130.000	0.122
91.000	0.255		131.000	0.120
92.000	0.251		132.000	0.118
93.000	0.246		133.000	0.116
94.000	0.241		134.000	0.113
95.000	0.237		135.000	0.111
96.000	0.232		136.000	0.109
97.000	0.228		137.000	0.107
98.000	0.224		138.000	0.105
99.000	0.220		139.000	0.103
100.000	0.215		140.000	0.101
101.000	0.211		141.000	0.099
102.000	0.207		142.000	0.098
103.000	0.204		143.000	0.096
104.000	0.200		144.000	0.094
105.000	0.196		145.000	0.092
106.000	0.192		146.000	0.090
107.000	0.189		147.000	0.089
108.000	0.185		148.000	0.087
109.000	0.182		149.000	0.085
110.000	0.178		150.000	0.084
111.000	0.175		151.000	0.082
112.000	0.172		152.000	0.081
113.000	0.169		153.000	0.079
114.000	0.165		154.000	0.078
115.000	0.162		155.000	0.076
116.000	0.159		156.000	0.075
117.000	0.156		157.000	0.073
118.000	0.153		158.000	0.072
119.000	0.151		159.000	0.071
120.000	0.148		160.000	0.069
121.000	0.145		161.000	0.068
122.000	0.142		162.000	0.067
123.000	0.140		163.000	0.066
124.000	0.137		164.000	0.064
125.000	0.134		165.000	0.063
126.000	0.132		166.000	0.062
127.000	0.129		167.000	0.061
128.000	0.127		168.000	0.060



Table 36 (cont. 2). Dissipation of methyl bromide from five houses in Southern California after actively aerated before closing windows<sup>a</sup>.

After 72-hour aeration			After 72-hour aeration	
Hours	Measured MB (ppm) <sup>b</sup>		Hours	Extrapolated MB (ppm) <sup>c</sup>
169.000	0.059		193.000	0.037
170.000	0.057		194.000	0.037
171.000	0.056		195.000	0.036
172.000	0.055		196.000	0.035
173.000	0.054		197.000	0.035
174.000	0.053		198.000	0.034
175.000	0.052		199.000	0.033
176.000	0.051		200.000	0.033
177.000	0.050		201.000	0.032
178.000	0.049		202.000	0.031
179.000	0.049		203.000	0.031
180.000	0.048		204.000	0.030
181.000	0.047		205.000	0.030
182.000	0.046		206.000	0.029
183.000	0.045		207.000	0.029
184.000	0.044		208.000	0.028
185.000	0.043		209.000	0.028
186.000	0.043		210.000	0.027
187.000	0.042		211.000	0.027
188.000	0.041		212.000	0.026
189.000	0.040		213.000	0.026
190.000	0.039		214.000	0.025
191.000	0.039		215.000	0.025
192.000	0.038		216.000	0.024

- <sup>a</sup> locations of fumigated houses: 1) Downey, LA, CA. (Application date 4/7/92)  
2) Long Beach, LA, CA. (Application date 4/7/92)  
3) Downey, LA, CA (Application date 4/7/92)  
4) Downey, LA, CA. (Application date 4/7/92)  
5) Walnut, LA, CA. (Application date 4/7/92)

application rate was 1.5 lb/1,000 ft<sup>3</sup>.

- <sup>b</sup> MB concentrations after fumigated houses were actively aerated for 24 hours.

- <sup>c</sup> MB concentrations during the 7-day reentry period after active aeration for 3 days.

Table 37. MB concentrations in fumigated houses after a 72-hour aeration period (9).

Regions of California	Fumigation rate (Lbs MB/1,000 ft <sup>3</sup> )	MB concentrations (ppb, 24-hour TWA)	
		Day 1 (mean)	Days 1-7, mean $\pm$ STDEV (range)
Southern	1.5	$\leq 210^*$	$86 \pm 73$ (15 - 229)
Northern	3.0	$\leq 210^*$	$172 \pm 147$ (30 - 458)

\* based on the target level of 210 ppb (Nelson, 1992)

#### 10. Exposure of residents to methyl bromide during commodity fumigation.

During commodity fumigation and aeration periods, leaks and offgassing with subsequent dilution can aid in dispersion of MB vapor into the surrounding areas. Residents who live at or beyond an established buffer zone may be exposed to airborne MB. The following assumptions were used to estimate exposure of residents to airborne residues of MB from commodity fumigation.

1. Residents live at an established buffer zone. We did not attempt to estimate exposure of residents beyond the buffer zone.
2. The wind blows continually from the fumigation areas toward residential areas in the same direction. This represents an extreme exposure scenario.
3. Residents are assumed to be exposed to MB at the target level of 210 ppb calculated as the 24-hour TWA (Nelson, 1992).
4. The housing structure does not provide protection from inhalation exposure to MB.
5. There are intermittent fumigations of chambers in those areas contributing to exposure days of more than approximately 30% of days in a 7-day, 90-day or 365-day period. These exposures constitute subacute, subchronic and chronic exposures, respectively (Sanders, 1998). Likewise, if exposure days are less than the specified exposure frequency, there will be no subacute, subchronic and chronic exposures. Also, more frequent MB fumigations in those areas will result in maintaining the target exposure level at or close to the target level of 210 ppb.

The low and high range of exposure days for workers during commodity fumigations were adopted from Haskell (1998a, 1998b) for use in the estimation of residential exposure. Subacute, subchronic and chronic exposures are shown in Table 38.

Table 38. Exposure of residents to airborne methyl bromide during commodity fumigation<sup>a</sup> (10).

Range of exposure	Subacute exposure		Subchronic exposure		Chronic exposure	
	/7days	MB (ppb)	/90 days	MB (ppb)	/365 days	MB (ppb)
Low <sup>b</sup>	3	90	30	70	150	86
High <sup>b</sup>	6	180	75	175	185	106

<sup>a</sup> assumed residents are exposed to the target level of 210 ppb (24-hour TWA).

<sup>b</sup> exposure days per 7, 90, and 365 days were assumed to be the same as those for workers during commodity fumigation as indicated by Haskell (1998a, 1998b). The low and high ranges of exposures represent the low and high exposure days of each exposure category, which were employed from various commodity fumigations.

Figure 1. First order dissipation of methyl bromide from five southern California houses after actively aerated for 24 hours before closing windows

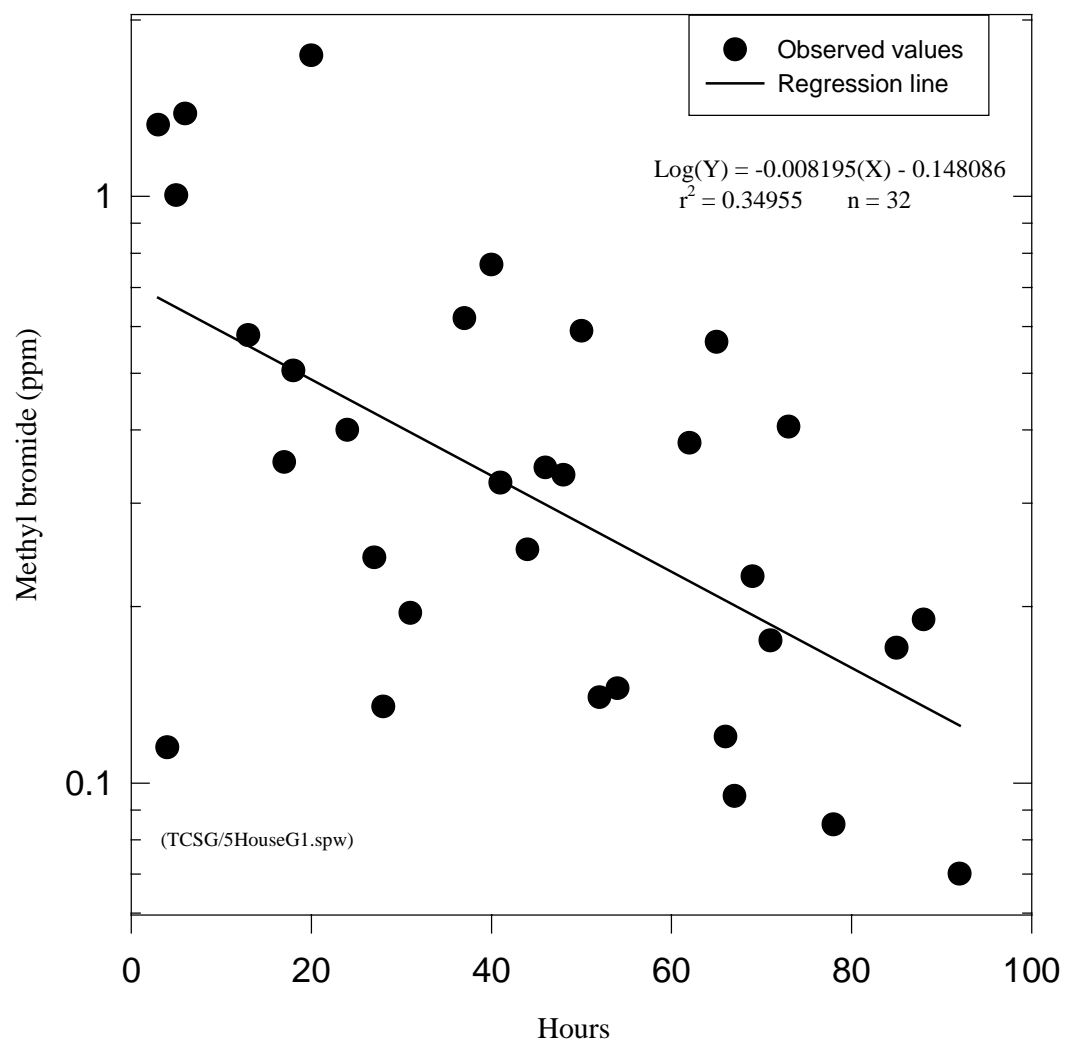
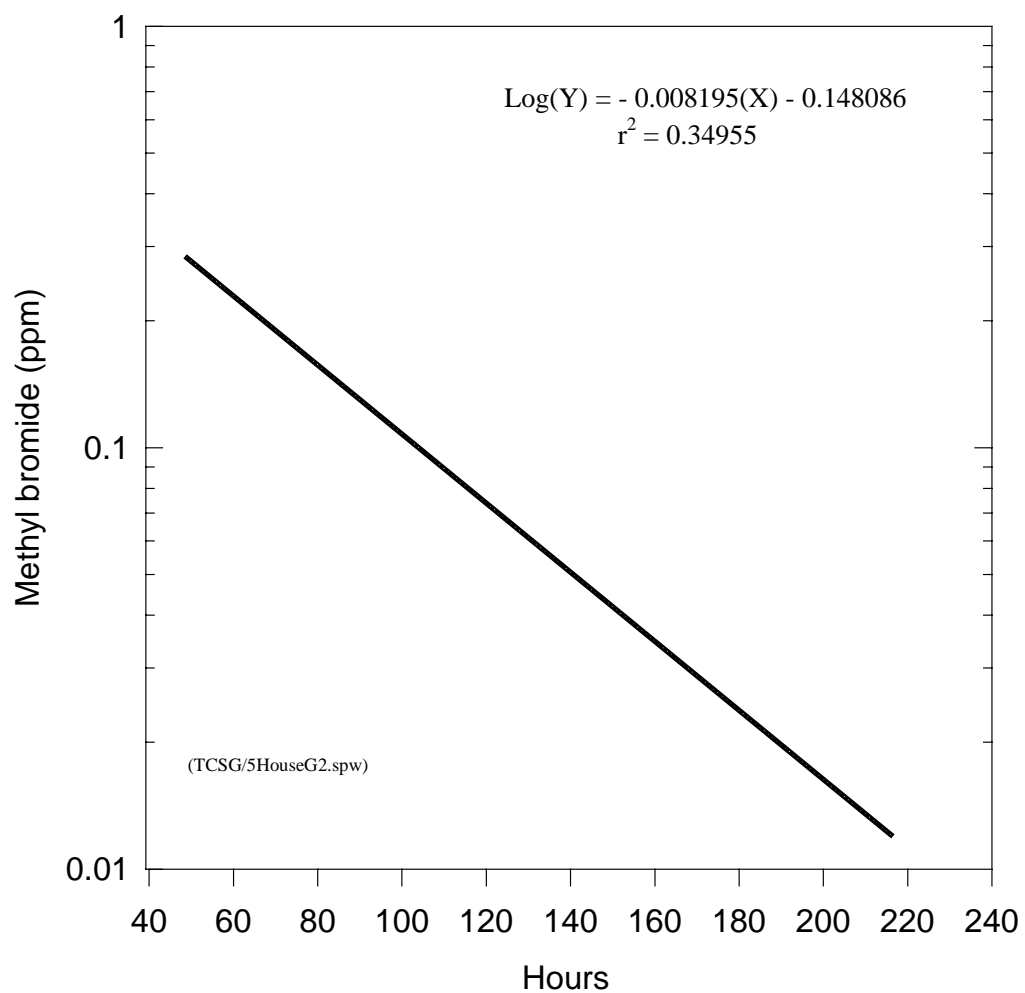


Figure 2. First order dissipation of methyl bromide from five southern California houses after actively aerated for 72 hours before closing windows



## **Appendix D**

### **Exposure of residents to MB from living near fumigated fields**

The potential for subchronic exposure of residents to MB from living near fumigated fields was evaluated by Sally Powell of DPR. The attached memoranda of July 31, 1998 and December 16, 1998 demonstrated procedures employed in the evaluation. Basically, the evaluation relied on MB use report data in 1995. The evaluation focused on the peak 3-month use period in four high use counties. Frequency distribution of exposure days (defined as days when gas may be present in the air) was obtained during that use period.

Results from this evaluation indicated that some sections in those counties would have MB gas present for 30 or more days during the 90-day period. However, a quantitative determination of the exposure cannot be made at this time.

The acute exposure level for residents living near fumigated fields was assumed to be 210 ppb, which is the current regulatory level used to determine the buffer zone distance in the DPR permit conditions.



Peter M. Rooney  
Secretary for  
Environmental  
Protection

## Department of Pesticide Regulation

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James W. Wells, Director  
1020 N Street • Sacramento, California 95814-5624 • [www.cdpr.ca.gov](http://www.cdpr.ca.gov)



Pete Wilson  
Governor

### MEMORANDUM

TO: John Ross, Senior Toxicologist  
Worker Health and Safety Branch  
Department of Pesticide Regulation

FROM: Sally Powell, Senior Environmental Research Scientist  
Worker Health and Safety Branch

DATE: July 31, 1998

SUBJECT: EVALUATION OF POTENTIAL SUBCHRONIC EXPOSURE TO  
METHYL BROMIDE USING PESTICIDE USE REPORT DATA

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As you requested, I evaluated the potential for subchronic (defined as at least 30 days in any 90-day period) exposure to methyl bromide, using a dataset provided by Bruce Johnson and Yihua Lin of EMPM. Yihua extracted PUR data on methyl bromide applications, excluding commodity and structural fumigations, in the four counties with the greatest total pounds applied in 1995. For each of those counties they selected the three consecutive calendar months accounting for the greatest proportion of total use in the county that year.

#### *Offsite exposure*

Offsite exposure was evaluated on a section-by-section basis. The top four counties and peak 3-month periods were Fresno (Oct.-Dec.), Kern (July-Sept.), Monterey (Sept.-Nov.) and Ventura (July-Sept.). A total 1137 applications were made in 366 sections during the peak periods in these four counties. In 49 sections (13%), 6 or more applications were made during the peak period.

Frequency distribution of methyl bromide applications per section  
 (peak 3-month period in 1995).

Number of applications	<i>freq</i>	Number of application s	<i>freq</i>
1	153	11	2
2	59	12	4
3	46	13	2
4	34	14	1
5	25	15	1
6	9	17	1
7	13	18	1
8	6	20	1
9	5	29	1
10	2		

I estimated the number of exposure days per section by using the actual dates of applications in the 74 sections having at least 5 applications, and assuming that methyl bromide gas would be present for 7 days following each application. Treated fields must be under tarps for 5 days according to current permit conditions. No off-gassing interval has been agreed upon for methyl bromide, but gas does escape during the time the field is tarped, and it can reasonably be expected to escape for at least 2 more days after tarp removal.

Exposure days in peak 3-month use period.

Number of days	<i>freq</i>
< 20	20
20 - 24	16
25 - 29	9
30 - 34	13
35 - 39	4
40 - 44	4
45 - 49	2
50 - 69	5
90	1



Of 29 sections having 30 or more exposure days in the 3-month period, 17 were in Monterey County, 9 in Ventura, 3 in Fresno and none in Kern County.

These numbers suggest that we should pursue the assessment of subchronic offsite exposure in Monterey County, and possibly in Ventura County as well. If a distribution of seasonal average concentrations in ambient air for the 17 sections can be developed, the exposure assessment can be done using the program previously used for 1,3-dichloropropene. Bruce Johnson has told me that it would be possible to develop the distribution using the ISCST3 model, although it would be a lot of work and require quite a bit of time.

#### *Applicator exposure*

The PUR database does not include the applicator identification number (only the grower i.d. for the owner of the treated property). It cannot, therefore, be used to evaluate potential exposure to individual applicators. The use reports themselves do include the applicator i.d., so the information could be obtained by going to the individual counties, searching through the paper files and hand-tabulating information. This would be a great deal of work, which I do not think would be justified, since the applicator i.d. number pertains to a company and thus is only a surrogate for identifying individual persons.

In order to find out about individual exposures, we will probably have to go to the pest control operators. Apparently, Tri-Cal is doing most of the methyl bromide field applications now, so it could be relatively easy to obtain the information. Monterey County had the greatest number of applications, 521 between September and November 1995. The fact that one company is doing most of the applications makes it likely that individual applicators will have more than 30 days of exposure. I suggest that we try to get Tri-Cal's employee records from Monterey County for September through November of last year.



Peter M. Rooney  
*Secretary for  
Environmental  
Protection*

## Department of Pesticide Regulation

---

James W. Wells, Director  
1020 N Street • Sacramento, California 95814-5624 • [www.cdpr.ca.gov](http://www.cdpr.ca.gov)



Pete Wilson  
*Governor*

### MEMORANDUM

TO: John Ross, Senior Toxicologist  
Worker Health and Safety Branch  
Department of Pesticide Regulation

FROM: Sally Powell, Senior Environmental Research Scientist  
Worker Health and Safety Branch

DATE: December 16, 1998

SUBJECT: ADDENDUM TO MEMORANDUM TO JOHN ROSS DATED  
JULY 31, 1998, RE: EVALUATION OF POTENTIAL SUBCHRONIC  
EXPOSURE TO METHYL BROMIDE USING PESTICIDE USE REPORT  
DATA

---

This is an addendum to the evaluation of potential offsite subchronic exposure to methyl bromide reported in my July 31 memo to you (attached). In that evaluation I estimated the number of exposure days (defined as days when gas may be present in the air) per section for the 74 sections with 5 or more applications within a 3-month peak use period in 1995. The number was calculated using the dates of the actual applications and assuming that methyl bromide gas would be present for 7 days after each application. Seven days of off-gassing were assumed because permit conditions require most treated fields to be under tarps for 5 days. Gas is known to escape during the time a field is tarped, so at a minimum gas is expected to be present during 5 days. It can reasonably be expected that gas will continue to escape for at least 2 more days after tarp removal, but because no off-gassing interval has been agreed upon for methyl bromide, I have included in this memo the number of exposure days under 5- and 6-day off-gassing assumptions as well as 7 days.

It should be noted that these estimates have a bias toward being too low. Randy Segawa pointed out that the number of application days reported in the PUR understates the actual number for strawberry fields in Monterey County. This is due to the current practice of spreading the treatment of a single field over several days in order to satisfy permit restrictions; because only one field is involved, only

one application date is reported. More than half the sections with 30 or more exposure days are in Monterey County (under any off-gassing assumption), and in September-November 1995, 85 % of the agricultural applications of methyl bromide in that county were to strawberries.

Frequency distribution of exposure days per section during peak 3-month use periods in 74 sections with five or more applications in 1995.

Number of days gas is present	Assumed off-gassing interval (days)		
	5	6	7
	-----freq-----		
< 20	37	29	20
20 - 24	15	14	16
25 - 29	8	14	10 <sup>a</sup>
30 - 34	5	4	12 <sup>b</sup>
35 - 39	1	4	5 <sup>c</sup>
40 - 44	5	2	3 <sup>d</sup>
45 - 49	0	4	2
50 - 69	2	2	5
76	1		
86		1	
93			1

<sup>a, b, c, d</sup> In the original memo, these values were erroneously reported as 9, 13, 4 and 4, respectively.

Thus, depending on the off-gassing interval, 14, 17 or 28 sections would have methyl bromide gas present for 30 or more days during the 90-day period.

Attachment: Memo to John Ross from Sally Powell dated July 31, 1998